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ABSTRACT

A report on Bureau of Indian Affairs (BIA) plans to consolidate off-reservation Indian boarding schools resulted from a request by 26 Representatives that the General Accounting Office review the 10 BIA schools, in order to assess the basis for school closures and BIA plans for student placement. Randomly selected student files (210) indicated educational criteria were the primary reason for student admission at 5 schools and social criteria at 4 schools. During 1982-83, eight schools offered at least three major special education and social programs, and two offered two; these programs included remedial learning in mathematics, reading, and language for students performing two or more years below normal grade level; handicapped education (basic subjects, special training); and intensive residential guidance (counseling, supervised study recreational activities) for students who had problems staying in school. Between 1978 and 1983, staffing decreased at eight schools and increased at two, resulting in changes in courses offered. In the same period, enrollments declined at 6 schools and increased at 4; largest decreases (46%, 57%) were because no 1982 freshmen were admitted to 2 high schools BIA planned to close. Appendices contain summaries of the 10 schools, with information on history, student social/educational characteristics, special programs, physical condition of school, staffing, enrollment, and dormitory/classroom space. (MH)

RC

REPORT BY THE U.S.

General Accounting Office

ED238631

Bureau Of Indian Affairs Plans To Consolidate Off-reservation Indian Boarding Schools

The Bureau of Indian Affairs is consolidating its 10 off-reservation Indian boarding schools and plans to close 4 schools by the end of the 1984-85 school year. This report discusses each of the schools and reviews the information the Bureau used in reaching its consolidation decisions.

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WASHINGTON, D.C. 20548

RESOURCES, COMMUNITY,
AND ECONOMIC DEVELOPMENT
DIVISION

B-114868

To Selected Members
of Congress
House of Representatives

This report discusses the results of our review and verification of information that the Bureau of Indian Affairs considered in its decision to consolidate its system of off-reservation Indian boarding schools. We made our review in response to the September 24, 1982, request by the following Members of Congress: the Honorable Douglas K. Bereuter, George E. Brown, Jr., Shirley Chisholm, William Clay, Thomas A. Daschle, Byron L. Dorgan, Dennis E. Eckart, Glenn English, Arlen Erdahl, James V. Hansen, Jack Hightower, James R. Jones, Dale E. Kildee, Ray Kogovsek, Dave McCurdy, James L. Oberstar, Carl D. Perkins, Peter A. Peyser, William R. Ratchford, Martin Olav Sabo, Paul Simon, Mike Synar, Morris K. Udall, Wes Watkins, Pat Williams, and Harold Washington.

As arranged with your offices, we are sending copies of this report to the Director, Office of Management and Budget; the Secretary of the Interior; interested congressional committees and subcommittees; and other interested parties. Copies will be available to others upon request.

Ralph Scalone for

J. Dexter Peach
Director

REPORT BY THE U.S.
GENERAL ACCOUNTING OFFICE

BUREAU OF INDIAN AFFAIRS PLANS TO CONSOLIDATE OFF-RESERVATION INDIAN BOARDING SCHOOLS

D I G E S T

The Bureau of Indian Affairs (BIA), Department of the Interior, operated 10 off-reservation boarding schools (ORBS) for Indian students during the 1982-83 school year. These schools--two elementary and eight high schools--educate children who do not have suitable educational opportunities in their communities or who have social problems. In February 1978 GAO recommended that BIA consolidate its ORBS system and dispose of unneeded facilities. During the following 4 years, five of the schools were closed, and in April 1983--citing GAO's February 1978 recommendation--BIA proposed to continue consolidating the ORBS system by closing four additional schools by the end of the 1984-85 school year. (See pp. 1 to 3.)

In a September 24, 1982, letter, 26 Representatives asked GAO to review the current situation at the 10 schools. The Representatives wanted information on the schools and their students in order to assess the basis for any BIA school closures. On October 27 and November 15, 1982, after GAO had started its review, BIA asked each school to develop data similar to that requested by the Representatives. To avoid duplication, GAO decided, with the requestors' approval, to monitor the schools' data gathering and, on a sample basis, verify student data relating to social and educational characteristics. (See p. 4.)

STUDENT SOCIAL AND EDUCATIONAL CHARACTERISTICS

BIA enrollment regulations required prospective ORBS students to meet 1 of 10 educational and social admission criteria. For example, educational criteria included public or BIA schools near the student's home that were overcrowded or did not offer the student's grade level. Social criteria, related to family environment, included student rejection or neglect and the lack of adequate parental supervision.

GAO's analysis of 210 selected student files (ranging from 14 to 45 files per school) at the 10 schools indicated that educational criteria were cited as the primary reason for student admission at 5 of the schools and social criteria as the primary reason for enrollment at 4 of the schools. GAO was unable to determine the primary enrollment reason at one school because of incomplete records. (See pp. 6 to 8.)

SPECIAL EDUCATION AND SOCIAL PROGRAMS

Eight of the schools offered at least three major special education and social programs during the 1982-83 school year. Two schools offered two major programs. These programs included (1) remedial learning that provided mathematics, reading, and language arts training for students who were performing 2 or more years below their normal grade level, (2) education for the handicapped, which included basic subjects as well as special training, such as speech training, and (3) intensive residential guidance, including counseling, supervised study, and recreational activities designed for students who have problems staying in school. BIA funding for these programs for the 1982-83 school year ranged from $113,257 to $584,000 per school.

Nine of the 10 schools also offered additional, but less formal, special programs such as drug and alcohol abuse education, vocational training, mental health services, and solo-parent training for student parents. (See pp. 8 to 10.)

PHYSICAL CONDITION OF THE FACILITIES

Architectural and engineering studies in 1979 that estimated costs necessary to bring the school facilities up to applicable health and safety standards found the schools in generally good physical condition. Only one school was rated in poor condition. In 1980 BIA developed a computerized facilities backlog report that identifies improvements and repairs needed at each school.

As of December 1982 the schools' estimates of the cost of their improvement and repair backlogs ranged from $169,000 to $4.5 million. (See p. 11.)

STAFFING

Between school years 1978-79 and 1982-83 (1980-81 and 1982-83 in one case), the staffing levels decreased at eight schools and increased at two schools. The decreases ranged from 2 to 52 percent; the increases were 15 and 24 percent (two of the schools, which had decreases of 26 and 52 percent, did not admit freshman classes in 1982-83). The staff levels generally changed in all categories, including academic, special education, dormitory, and facility management staff.

As a result of the staff level changes, student course offerings were affected in a variety of ways. For example, at the school with the 52-percent decrease, seven education programs in mathematics, science, and language arts were eliminated or reduced. However, at the school with the 15-percent increase, almost twice as many courses were added as were dropped. (See pp. 12 and 13.)

ENROLLMENT

Between school years 1978-79 and 1982-83, student enrollment declined at six schools and increased at four schools. The largest enrollment decreases were 46 and 57 percent, primarily because no freshmen class was admitted in the 1982-83 school year at two of the high schools BIA planned to close. The largest enrollment increase was 87 percent, primarily because additional dormitory facilities were opened. (See p. 14.)

DORMITORY AND CLASSROOM SPACE CRITERIA

In March 1980 BIA issued informal guidelines for maximum class size and minimum dormitory space per student for each grade level. School officials were generally aware of size criteria for classrooms but were unaware of space criteria for dormitories.

In March 1983 BIA published a proposed rule that would, for the first time, formally establish national criteria for dormitories. Comments from interested parties were being reviewed by Interior at the time this report was written.

Tear Sheet

Some States have classroom space criteria, but GAO did not find any dormitory space criteria published by State or educational-related organizations that were comparable to BIA's March 1983 proposed criteria. (See pp. 15 to 17.)

STUDENT PLACEMENT PLANS

In July 1982 BIA anticipated closing five schools. These schools were directed to prepare individual student placement plans to ensure that educational and social alternatives would be available to the students if the schools were closed. Although BIA's announced intention was to consolidate the ORBS system, the placement plans showed that many students would attend non-BIA schools. The placement plans were generally based on parent and/or student preference or, alternately, on school staff assignments usually to the public school nearest the student's home. One of the schools did not prepare student placement proposals in such cases because school officials believed that, under Federal law, the decision was the parents' responsibility. The placement plans were often incomplete and contained minor inaccuracies. The placement plans for almost half the students in GAO's sample at one school showed that the students would attend schools in Alaska that were not yet accredited. (See pp. 17 and 18.)

VIEWS OF AGENCY OFFICIALS

The Acting Director, Office of Indian Education Programs, after reviewing a draft of this report, said that generally he had no major problems with the information it presented. He stated that BIA's data on the schools was slightly different in some areas from the information contained in this report because some of the figures were adjusted after the schools submitted the initial information.

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	Riverside Indian School, Oklahoma	51
	Sequoyah High School, Oklahoma	55
	Sherman Indian High School, California	60
	Wahpeton School, North Dakota	65

ABBREVIATIONS

BIA	Bureau of Indian Affairs
GAO	General Accounting Office
IRG	Intensive Residential Guidance
ORBS	off-reservation boarding schools

CHAPTER 1

INTRODUCTION

The Snyder Act of November 2, 1921 (25 U.S.C. 13), which is administered by the Department of the Interior's Bureau of Indian Affairs (BIA), provides for operating boarding schools, dormitories, and day schools for Indian youth at the kindergarten, elementary, middle, high school, and post-high school levels. Title 25, section 31.1, of the Code of Federal Regulations (1982) authorizes enrollment in BIA-operated schools to Indian children who live on Indian reservations under BIA jurisdiction, on other lands under BIA jurisdiction, or near a reservation when denying such enrollment would have a direct effect on Bureau programs within the reservation, except when other appropriate school facilities are available to the children. When BIA determines that no appropriate local education agency is able to provide suitable free education for Indian children, BIA constructs and operates school facilities to educate the children.

On February 15, 1978, we issued a report entitled "Bureau of Indian Affairs Not Operating Boarding Schools Efficiently" (CED-78-56) addressing the underuse of BIA off-reservation boarding schools (ORBS). At that time BIA operated 15 such schools. Our report recommended that BIA consolidate its ORBS system into the minimum number of facilities needed and to dispose of unneeded facilities, buildings, and equipment in accordance with appropriate procedures. In the 4 years following our February 1978 report, BIA closed five schools.

During school year 1982-83 BIA operated 10 off-reservation Indian boarding schools in eight States. The two elementary schools are in Concho, Oklahoma, and Wahpeton, North Dakota. The eight high schools are in Chemawa, Oregon; Flandreau, South Dakota; Brigham City, Utah (Intermountain High School); Mount Edgecumbe, Alaska; Phoenix, Arizona; Anadarko, Oklahoma (Riverside Indian School); Tahlequah, Oklahoma (Sequoyah High School); and Riverside, California (Sherman High School). The ORBS system was established to educate Indian children who did not have suitable day school educational opportunities in their communities or had behavioral or social problems. However, Indian students without special needs have also been allowed to enroll at the schools under more recently relaxed enrollment criteria, according to ORBS officials.

ANNOUNCEMENT OF PROPOSAL TO CLOSE SCHOOLS

On March 17, 1982,[1] BIA publicly announced its intention to develop an overall operational plan for its educational programs that included a phased closure of seven boarding

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[1]Federal Register, vol. 47, no. 52, p. 11568.

schools to be completed by the end of the 1984-85 school year. The three remaining boarding schools were to continue operating until such time as it was determined that adequate alternatives were available to meet the needs of students attending the off-reservation boarding schools. In July 1982, however, BIA announced that, based on comments it had received, the Phoenix and Flandreau Indian High Schools would not be closed as originally proposed. From October 1982 through April 1983, plans (called consultation plans) were developed that contained information on the proposed closures of Mount Edgecumbe, Intermountain, Sequoyah, Concho, and Wahpeton boarding schools, as well as the space availability and budgetary impacts of these closures on the remaining five off-reservation boarding schools. In April 1983, after further public and tribal consultations, BIA announced that the Wahpeton Indian School would not be closed but would continue operation of grades 4 through 8.

The table on the following page presents the actions planned by BIA as of May 1983 and some school year 1982-83 ORBS operational statistics.

School	Planned action	School year 1982-83 Student enrollment	Staff positions	School budget[a]
Elementary				
Concho Indian School Concho, Oklahoma	To be closed June 1983[b]	137	66	$ 1,194,547
Wahpeton School Wahpeton, North Dakota	Continue operation[c]	306	91	2,032,578
Secondary				
Chemawa Indian School Chemawa, Oregon	Continue operation	429	127	3,180,000
Flandreau School Flandreau, South Dakota	Continue operation	485	134	3,236,109
Intermountain High School Brigham City, Utah	To be closed June 1984	390[d]	166	3,745,450
Mount Edgecumbe High School Mount Edgecumbe, Alaska	To be closed June 1983	238[d]	109	5,769,627
Phoenix High School Phoenix, Arizona	Continue operation[e]	547	158	4,000,000
Riverside Indian School Anadarko, Oklahoma	Continue operation	237	89	1,951,921
Sequoyah High School Tahlequah, Oklahoma	To be closed June 1984	179	67	1,598,310
Sherman High School Riverside, California	Continue operation[f]	741	181	5,432,000
Total		3,689	1,188	$32,140,542

[a]Includes estimated educational and facilities management funding.

[b]Transfer of programs for grades 2 through 8 to Riverside Indian School, Anadarko, Oklahoma.

[c]Continue operation of grades 4 through 8.

[d]No freshman class admitted in 1982-83 school year.

[e]Expand specialized vocational education curriculum.

[f]Expand specialized college preparatory curriculum.

OBJECTIVES, SCOPE, AND METHODOLOGY

On September 24, 1982, 26 Representatives asked us to assess the situation at each BIA off-reservation boarding school. We were to assess school and student information that BIA considered in its school closure decision process. This information included (1) the student bodies' social and educational characteristics, (2) each school's special program offerings, (3) the schools' physical condition, including the repair and renovation costs necessary to bring the facilities up to applicable health and safety standards, (4) each school's staffing and enrollment patterns over the past 5 years as well as the effects of staffing changes on the educational programs, (5) the criteria used to determine enrollment capacities, and (6) BIA planning to ensure that proper educational/social alternatives would be available to the students if the schools closed.

On October 27 and November 15, 1982, after we had started our work, BIA asked each school to develop data on the above areas. To avoid duplication, we decided, with the requestors' approval, to monitor the schools' data gathering and, on a sample basis, verify their student data.

We randomly selected our sample of 210 student files (ranging from 14 to 45 files per school) from the total 10-school universe of about 3,700 students enrolled in October-November 1982. Time and resource constraints did not allow us to select a sufficiently large sample (about 1,100 files) to permit the projection of our sample results to individual schools or the 10-school universe. We traced our sample students' names through supporting school registration documents to identify the reasons recorded for enrollment and compared our results with those the schools submitted to BIA.

Other verification work included reviewing staff rosters, student file data, course schedules, and other academic and facility management records. We visited each schools' facilities and compared student dormitory and classroom space availability with space criteria suggested under BIA draft guidelines. In addition, we contacted several Catholic Indian boarding schools, the National Education Association, the National Association of Independent Schools, the American Institute of Architects, and the U.S. Department of Education and reviewed an American Institute of Architects' survey of State regulations in an effort to identify dormitory and classroom space criteria that other schools might use.

We obtained budget information for the 1982-83 school year for each school, including amounts budgeted for education programs and facility management.

We interviewed boarding school officials, who usually included each school's principal, special program directors, dormitory supervisors, and facility managers. We also interviewed each school's applicable BIA area office Indian Education Program Director; the BIA Office of Indian Education Program Director in Washington, D.C.; and the BIA's School Facility Staff Division Director in Albuquerque, New Mexico. We made our review in accordance with generally accepted government auditing standards.

CHAPTER 2

INFORMATION ON 10 OFF-RESERVATION INDIAN BOARDING SCHOOLS

This chapter summarizes the information we developed on the 10 off-reservation Indian boarding schools as a result of our verification review. Further details on the individual schools are discussed in appendix I. The admission information we developed at the schools indicated that social and educational reasons for student enrollments were about equally important. The schools offered various special educational and social programs designed to help students overcome specific problems. Placement plans developed by five schools did not include information about special educational and social programs available to students at the proposed alternate schools. The schools' general physical condition as determined by the facility manager and BIA area office ranged from poor to good/excellent. Both staffing and student enrollment had generally declined at the schools during the last 5 years.

SOCIAL AND EDUCATIONAL CHARACTERISTICS OF THE STUDENT BODIES

To enroll in an Indian off-reservation boarding school, prospective Indian students were required by BIA regulations to meet one of the following five social or five educational admission criteria.

Social criteria

In his/her family environment, the student

--was rejected or neglected,

--did not receive adequate parental supervision,

--was imperiled due to family behavioral problems,

--had behavioral problems that were too difficult for the family or local resources to solve, or

--had siblings or other close relatives enrolled who would be adversely affected by separation.

Educational criteria

The public/BIA day school near the student's home

--was severely overcrowded,

--did not offer student's grade level,

--exceeded 1-1/2 mile walking distance to school or bus,

--did not offer special vocational/preparatory training necessary for student's gainful employment, or

--did not offer adequate provisions to meet academic deficiencies or linguistic/cultural differences.

In developing its ORBS operational plan, BIA instructed officials of the 10 schools to develop a summary of the social and educational reasons for student admissions using the educational and social criteria. Five of the schools cited educational reasons as their students' primary enrollment reasons, four schools cited social reasons, and one school cited both educational and social reasons as equally important.

School officials told us that the Education Amendments of 1978, Public Law 95-561, grants parents the right to decide which Indian off-reservation boarding school they want their children to attend. School officials also said that staff reductions, especially cutbacks in counselors and admissions staff, had made student data gathering more difficult. As a result, the 10 schools did not always complete the social and educational reasons for the enrollment section of the students' applications as required by BIA regulations. In compiling the summary of social and educational reasons for student admissions, the schools used information in student enrollment files, obtained information directly from students, and relied on the school staffs' personal knowledge.

Our analysis of student enrollment records for a random sample of 210 students out of a total 10-school student population of 3,689 enrolled during October and November 1982 indicated the following reasons for 179 student admissions when enrollment information was provided.

School	Enrollment reasons by percentage	
	Social	Educational
Chemawa	40	60
Concho	82	18
Flandreau[a]	-	-
Intermountain	27	73
Mt. Edgecumbe	24	76
Phoenix	17	83
Riverside	62	38
Sequoyah	54	46
Sherman	37	63
Wahpeton	52	48

[a]Flandreau's student enrollment records were not sufficiently complete (12 of 15 sample files showed no admission reasons) to develop useful percentages.

Standard achievement tests given students at the 10 schools in 1982 showed that, on the average, students were performing from one to three grades below their grade levels.

SPECIAL PROGRAMS

Of the 10 schools, all but Wahpeton and Mount Edgecumbe offered at least three major special educational/social programs for the 1982-83 school year. Wahpeton and Mount Edgecumbe each offered two. BIA funding for the major programs ranged from $113,257 at Mount Edgecumbe to $584,080 at Intermountain, as the following table shows.

BIA Funding of
Major Special Programs

School	Remedial learning	Handicapped education	Social guidance	Total
Chemawa	$100,600	$86,770	$104,382	$291,752
Concho	67,000	16,668	98,115	181,783
Flandreau	166,733	67,242	195,239	429,254
Intermountain	235,000	159,000	190,080	584,080
Mt. Edgecumbe	93,436	10,901	[a]8,920	113,257
Phoenix	177,883	63,184	31,078	272,145
Riverside	98,640	30,315	112,981	241,936
Sequoyah	88,600	37,718	89,903	216,221
Sherman	244,000	33,000	76,000	353,000
Wahpeton	98,776	87,528	No program	186,304

[a]Mt. Edgecumbe had received $8,920 for a social guidance program, but as of January 1983 the program had not started because school officials had not found a social worker to operate the program.

Remedial learning

Title I of the Elementary and Secondary Education Act (now referred to as chapter 1 of subtitle D of title V of Public Law 97-35) provides special funds for mathematics, reading, and language arts training for students who are performing 2 or more years below normal grade level.

Education of the handicapped

This program is funded by the Education for All Handicapped Children Act of 1975, Public Law 94-142. Basic subjects in the program are reading, English, and mathematics. Speech training, specific learning disability, and health-impaired programs are offered if required for any student.

Social guidance

The Intensive Residential Guidance (IRG) Program is designed to help students who have problems staying in school. It deals with students in a residential setting, including afterschool hours, nights, and weekends. The students are

screened by the professional staff, and a program is developed to help the students overcome specific problems. These include drug abuse, truancy, court-related problems, and disruptive behavior. The program usually includes 5 hours of special services weekly for the student. Students are involved in small group and individual counseling sessions; a supervised study hour with tutorial assistance; and a variety of recreational activities, including intramural sports.

Other special programs

Many of the schools offered additional special programs such as drug and alcohol abuse education, career or vocational training, mental health services, and solo-parent training for students with children. Most of these programs were less formal than those described above, and many were funded under the schools' regular educational budgets or from non-BIA funds, as the following table shows.

BIA Funding of
Additional Special Programs

School	Drug/alcohol abuse	Career/ vocational	Mental health	Solo-parent
Chemawa	$123,250	(a)	(b)	No program
Concho	(a)	(a)	No program	No program
Flandreau	(a)	(a)	$8,920	$85,441[c]
Intermountain	(a, b)	(a)	No program	200,000[d]
Mt. Edgecumbe	(b)	(a)	No program	No program
Phoenix	(a, b)	(a)	No program	No program
Riverside	No program	$5,500	(a)	No program
Sequoyah	(a)	9,545	No program	No program
Sherman	(b)	(b)	(b)	40,000
Wahpeton	No program	No program	No program	No program

[a]Funded from school's regular education budget.

[b]Funded by Indian Health Service, community, or other non-BIA source.

[c]Proposed funding for fiscal year 1983.

[d]Amount shown is for 1981-82 school year. Program was not offered in 1982-83 school year.

PHYSICAL CONDITION OF THE SCHOOLS

BIA uses its Facilities Improvement and Repair Backlog Report to determine and document the improvements, repairs, and estimated costs necessary to bring all school buildings and utilities up to the building codes and standards that BIA has adopted. The first backlog report was developed in 1980 from data prepared in 1979 on each of nine schools (a new Chemawa facility was completed in 1981) by architectural/engineering firms under Department of the Interior contracts.

The architectural/engineering firms' 1979 estimates of improvement and repair costs at the nine schools ranged from $164,000 at Sherman to about $22 million at Mount Edgecumbe. As of December 1982 the schools and their respective BIA area offices reported backlog costs based on often unsupported estimates ranging from $169,000 at Chemawa to $4.5 million at Intermountain. The 1979 and 1982 estimates are shown in the following table.

School Improvement and Repair Cost Estimates[a]

School	Physical condition per 1979 review	1979 estimate ($ million)	Dec. 1982 estimate ($ million)	Change from 1978-79 to 1982-83 ($ million)
Chemawa	N/A	N/A	$0.17	N/A
Concho	Good	$2.03	1.46	- $0.57
Flandreau	Good	2.90	3.00	+ 0.10
Intermountain	Good	11.25	4.50	- 6.75
Mt. Edgecumbe	Poor	21.63	3.50	- 18.13
Phoenix	Good	1.30	1.13	- 0.17
Riverside	Good	6.22	1.29	- 4.93
Sequoyah	Good	2.84	1.26	- 1.58
Sherman	Good to excellent	0.16	1.60	+ 1.44
Wahpeton	Good	1.65	0.33	- 1.32

[a]We did not verify the improvement and repair cost estimates.

STAFFING

The changes in the 10 schools' staff levels, shown in the table on the following page, between school years 1978-79 and 1982-83 ranged from a 52-percent decrease at Intermountain (from 1980-81 to 1982-83) to a 24-percent increase at Sherman. Generally, the reductions were in all staffing categories, including academics, special education, dormitories, and facility management.[2] Course offerings were affected to varying degrees by the staff reductions, as shown on page 13.

Staffing Levels

School	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Chemawa	110	111	111	111	127	+ 15
Concho	84	86	76	66	66	- 21
Flandreau	140	140	118	120	134	- 4
Intermountain[a]	(b)	(b)	346	241	166	- 52[c]
Mt. Edgecumbe[a]	148	(d)	149	131	109	- 26
Phoenix	162	170	150	135	158	- 2
Riverside	144	127	91	89	89	- 38
Sequoyah	95	91	85	73	67	- 29
Sherman	144	144	148	143	181	+ 26
Wahpeton	100	102	97	89	91	- 9

[a]No freshman class admitted in 1982-83 school year.

[b]Records were not available at the school to determine the staffing level for the year because the school disposed of the records.

[c]From 1980-81 to 1982-83 school year.

[d]Records for this year were missing at the school.

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[2]Changes in the various staffing categories for each school are shown in app. I.

School Officials' Views on Effect of Staffing Level Changes on Course Offerings

School	Impact
Chemawa	Almost twice as many courses were added as have been dropped.
Concho	The music program, industrial arts program, and full-time librarian position were eliminated. One of two language arts positions was cut. The male physical education program was taught by the female physical education teacher.
Flandreau	No significant effect on academic programs.
Intermountain	Three education programs were eliminated. Course offerings in four other programs were reduced from 37 to 23.
Mt. Edgecumbe	A mixed effect on instructional operations and no effect on other operations. Some teachers were teaching two or three subjects rather than one or two. On the other hand, teachers had smaller classes. Minimal effect on class offerings.
Phoenix	The school was unable to cover classes effectively when staff were on leave; also had to reduce the number of class offerings.
Riverside	Classroom courses eliminated included physical science, band, chemistry, and consumer affairs. Budget cuts eliminated the yearbook, newspaper, and football program.
Sequoyah	The two basic reading courses were combined into one language arts course. The full-time librarian position and the vocational, agriculture, art, speech, and drama courses were eliminated.
Sherman	Although several classes were added or dropped from the curriculum, no appreciable difference existed in the overall number of courses offered.
Wahpeton	The school was unable to fill one teaching and the librarian position.

ENROLLMENT

Student enrollment had declined during the last 5 years at 6 of the 10 schools, as shown below.

Enrollment Levels

School	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Chemawa	229	222	333	446	429	+ 87
Concho[a]	204	181	177	167	137	- 32.8
Flandreau	445	423	487	378	485	+ 9
Intermountain[b]	898	753	791	779	390	- 56.6
Mt. Edgecumbe[b]	437	393	391	350	238	- 45.5
Phoenix	646	516	494	484	547	- 15
Riverside	242	243	278	259	237	- 2
Sequoyah	234	222	218	181	179	- 23.5
Sherman	689	585	695	687	741	+ 8
Wahpeton	299	294	295	262	306	+ 2.3

[a]Enrollment count not verified because records were either not available or in poor condition due to an office fire.

[b]No freshman class admitted in 1982-83 school year.

The student count, which is taken early in the school year, does not necessarily indicate the average enrollment during the entire year. Normally, the average attendance during the student count weeks is higher than the average attendance during the remainder of the school year.

The student withdrawal rate for the 1981-82 school year was about 36 percent for the 10 schools. The withdrawal rate for each school was 37 percent at Chemawa, 30 percent at Concho, 40 percent at Flandreau, 34 percent at Intermountain, 34 percent at Mount Edgecumbe, 42 percent at Phoenix, 47 percent at Riverside, 30 percent at Sequoyah, 33 percent at Sherman, and 28 percent at Wahpeton.

DORMITORY AND CLASSROOM SPACE CRITERIA

In March 1980 BIA's School Facility Staff Division issued informal guidelines for determining classroom and sleeping area spaces for its schools, including off-reservation boarding schools. The guidelines recommended maximum class size and square feet per student for each grade level. Class size and classroom space criteria ranged from 24 students and 60 square feet per student for kindergarten to 30 students and 30 square feet per student for grade 12. The March 1980 guidelines stated that for dormitory space, a total of 200 square feet per student should be allowed with free space in each sleeping area varying from 50 to 80 square feet per student depending on the closets, desks, beds, and other furniture in each room.

Although generally aware of the classroom criteria, school officials were generally unaware of the March 1980 dormitory space guidelines and, instead, usually used dormitory capacity criteria of two to four students per room.

In March 1983 BIA published a proposed rule that would establish national criteria for dormitory housing. The criteria is required as a result of the Education Amendments of 1978. Comments on the proposed rule, which were due by May 9, 1983, were under review at the time we wrote this report. The following table shows dormitory room vacancies for the 1982-83 school year.

School	Capacity reported by school[a]	Enrollment	Vacancies
Chemawa	400	429	0
Concho	256	137	119
Flandreau	592	485	107
Intermountain	800	390	410
Mt. Edgecumbe	349[b]	238	111
Phoenix	888	547	341
Riverside	370	237	133
Sequoyah	356[c]	179	177
Sherman	988	741	247
Wahpeton	396	306	90

[a]These dormitory capacities may not reflect the capacity available under BIA's March 1983 proposed dormitory space criteria.

[b]Mt. Edgecumbe reported a capacity of 410 students. However, the superintendent said that the capacity was only 349 students.

[c]Includes dormitory capacity of a recently renovated building that was not reported to BIA. The capacity reported to BIA was 288.

The proposed March 1983 rule states that the configuration of sleeping space and other living areas will vary according to the grade levels of the occupants but that sleeping rooms are to provide sufficient space and privacy for the resident students. The rule would require the following space and privacy requirements for dormitories:

--Dormitories serving grades kindergarten through 8 shall provide sleeping room space varying from 50 to 65 square feet per student, exclusive of furniture.

--Dormitories serving grades 9 through 12 shall provide sleeping room space of no less than 70 square feet per student, exclusive of furniture.

The proposed March 1983 rule states that a dormitory shall be considered at capacity when adding one more student would put the school out of compliance with the space standard and, upon reaching such capacity level, additional students shall not be admitted for residential purposes.

We contacted a number of other sources--such as Catholic Indian residential schools, educational accrediting associations, the American Institute of Architects, the National Education Association, the National Association of Independent Schools, and the U.S. Department of Education--to try to locate non-BIA dormitory and classroom space criteria. Except for criteria for classroom space provided by the American Institute of Architects, no other criteria could be located.

A September 1981 American Institute of Architects' survey revealed that 27 States had new construction, minimum school classroom space requirements; 3 States recommended minimum school classroom space criteria; and 17 States had no space criteria. Three States did not respond to the survey.

The States' classroom space criteria (where given) were shown as total square feet per room or per student. For example, 12 States reported classroom space criteria that ranged from 450 to 7,200 square feet per room (excluding theaters and cafeterias), depending on the grade level and specific room use. Seven States reported classroom space criteria that ranged from 7 to 150 square feet per student (excluding theaters and cafeterias), depending again on the grade level and specific room use. Seven States reported a criteria combination of square feet per room and per student.

PLACEMENT OF STUDENTS

BIA asked five of the schools (Concho, Intermountain, Mt. Edgecumbe, Sequoyah, and Wahpeton), in conjunction with their BIA area offices, to develop, as part of their consultation plans, individual student placement plans to ensure that proper educational and social alternatives would be available to their students if the schools closed. The placement plans were to be prepared for each student in grades 1 through 7 and 9 through 11. No placement plans were requested for students in grades 8 and 12 because placements were not necessary for graduating students.

Proposed placements were based on parent and/or student preference, if made. If neither parent nor student had a preference, the schools' staff, in conjunction with the BIA area office, made the proposed assignment. Parents' preferences included (1) other BIA schools, (2) public schools, and (3) other types of vocational or private schools. When a parent or student preference was not made, the school staff usually proposed placement in the public school nearest the student's residence. School officials at Intermountain said that they did not prepare individual student placement plans in those cases where parents or students did not indicate a preference because they believed that under Public Law 95-561, the parents were to decide where their children would attend school. The placement plans were often incomplete and contained minor inaccuracies. Our review of placement plans for 17 Mount Edgecumbe students showed that about half would attend schools in Alaska that were not yet accredited.

The student placement plans are discussed in greater detail in appendix I.

VIEWS OF AGENCY OFFICIALS

The Acting Director, Office of Indian Education Programs, BIA, after reviewing a draft of this report, stated that generally he had no major problems with the information it presented. He stated that BIA's data on the schools was slightly different in some areas than the information contained in this report because some of the figures were adjusted by BIA after the schools submitted the initial information.

INDIVIDUAL SUMMARIES ON THE OFF-RESERVATION INDIAN BOARDING SCHOOLS

CHEMAWA INDIAN SCHOOL, OREGON

Chemawa Indian School, which was established in 1880, provides high school education to students in grades 9 through 12. The school is located on a 360-acre campus 5 miles north of Salem, Oregon.

In 1981 a new school facility was completed with an instructional capacity of 600 students and a dormitory capacity of 400 students. The new facility was designed to permit increasing the dormitory capacity to 600 students. The campus comprises 27 buildings, including 10 student dormitories. The administration offices, classrooms, vocational shops, kitchen, dining hall, and student center are all under one roof. The recreational and physical education areas, gymnasium, auditorium, and swimming pool are also under a single roof.

Chemawa's 1982-83 school year budget was about $3,180,000.

Social and educational characteristics of the student body

Chemawa's December 1982 report to BIA headquarters showed that the 429 students enrolled represented 57 tribes or combinations of tribes. Although the students came from 16 States, more than half came from either Washington or Montana.

Fifty percent of the enrollment reasons cited in the Chemawa report were educational, with inadequate local provisions to meet academic deficiencies or linguistic/cultural differences the most frequently cited reason. The remaining 50 percent of the enrollment reasons cited were social, with behavioral problems too difficult for family or local resources to solve as the predominant reason.

Of the 15 student files we selected at random, 8 had documents showing students' reasons for enrolling at Chemawa. These eight students enrolled for six (60 percent) educational and four (40 percent) social reasons. Some student files contained more than one reason for enrollment. The remaining seven student files either did not contain any documented reasons for enrollment or indicated only student or parent preference as the reason for enrollment.

The results of a 1982 standard achievement test showed that Chemawa students were performing below their grade levels in reading, mathematics, and language arts skills. Grade 12 students were furthest behind in both reading and mathematics skills, scoring at 10 years, and 8 years and 8 months,

respectively. Grade 11 students were furthest behind in language arts skills at 8 years and 8 months.

Special programs

Chemawa's special programs and their funding levels were as follows.

Remedial learning

During February 1983, 172 Chemawa students in grades 9 through 12 were enrolled in remedial reading, mathematics, and language arts. The program (title I of the Elementary and Secondary Education Act) had three teachers and one education aide. Funding for the 1982-83 school year was about $100,600.

Education of the handicapped

Educational programs for the handicapped included the speech and language, specific learning disability, and health-impaired programs. The speech and language class provided evaluations and direct instruction for students with speech problems such as stuttering, articulation, and expressive language (mispronouncing words and omitting words from sentences). A part-time speech/hearing/language specialist provided services to three students for school year 1982-83. The program's 1982-83 school year budget was about $5,200.

The specific learning disability program instructed students in reading, mathematics, and language development to cope with and compensate for their handicapping conditions. A full-time teacher, a part-time teacher, and an aide provided services for 45 students. The program's 1982-83 school year budget was about $75,500.

The health-impaired program helped students make adaptations required because of their health problems. The common health problem was chronic inner ear infections. Four students participated in this program. The program budget for the 1982-83 school year was about $6,070.

Social guidance

This program, referred to as the Intensive Residential Guidance (IRG) Program, is designed to help students who have problems staying in school. It deals with students in a residential setting, including afterschool hours, nights, and weekends. The students are screened by the professional staff, and a program is developed to help them overcome specific problems. These include drug abuse, truancy, court-related problems, and disruptive behavior. The IRG program includes 5 hours of special services weekly for the students. They are involved in small group and individual counseling sessions; a

supervised study hour with tutorial assistance; and a variety of recreational activities, including intramural sports.

Chemawa's program served 95 students during school year 1982-83 and funding was $104,382. The IRG staff comprised one social worker, one education specialist, one psychologist, a part-time teacher, two counselors, and an education aide.

Mental health program

The mental health program provided recreational therapy and clinical services to 135 students. Two recreational therapists and a part-time psychiatric nurse provided services that were funded by the local Indian Health Service clinic.

Alcoholism education program

This program focused on raising the students' awareness and knowledge of the effects of alcohol and sought to modify consumption behavior. The program served 84 students during the school year with four full-time staff members and one part-time staff member. The program's 1982-83 school year budget was about $123,250.

Vocational education

Chemawa offered business and industrial education classes, including typing, shorthand, accounting, clerical procedures, mechanical drawing, and automobile mechanics. Funding was provided from the regular educational program budget.

Physical condition of the school

In 1981 BIA completed a new $21 million residential high school at Chemawa and abandoned the old buildings. In late 1980, while construction of the new campus was underway, a BIA-contracted consultant surveyed the construction site for energy conservation measures. The consultant's cost estimates of $168,000 were incorporated into BIA's 1982 Facilities Improvement and Repair Backlog Report.

Further, the BIA Portland Area Office facility manager had also scheduled $576,000 to demolish and remove the remaining structures on the adjacent old Chemawa campus, to landscape the site, and to construct a facility management/campus security building for the new campus. According to the Chemawa facility manager, the $576,000 reflected the probable cost to demolish the remains of the old buildings and return the site to a natural state. However, he believed that much of the $168,000 cost estimate in the BIA backlog report was overstated because

--some of the work had been done but had not been subtracted from the backlog report estimates and

--some of the work was unnecessary.

Although the backlog report may have contained cost estimates of work believed unnecessary or already done, needed improvements and repairs due to design/construction deficiencies and to vandalism were not included. According to the Chemawa facility manager, additional funds may be necessary to repair water damage due to leaking roofs, a poorly sealed gymnasium floor and swimming pool, and a malfunctioning central heating system.

Many campus buildings showed considerable damage, such as broken windows and doors, holes in walls and ceilings, broken furniture, broken light fixtures, inoperable plumbing, and broken school equipment. The Chemawa facility manager estimated the cost of the needed repairs to be at least $15,000 for the 1982-83 school year.

Staffing

Between school years 1978-79 and 1982-83, Chemawa's staff increased from 110 to 127, or 15 percent, as the following table shows.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	22	20	20	22	25	+ 14
Special education	3	4	4	5	6	+ 100
Dormitory staff	38	41	38	43	49	+ 29
Facility management	8	8	8	8	8	0
Other[a]	39	38	41	33	39	0
Total	110	111	111	111	127	+ 15

[a]Includes administrative staff and transportation personnel.

From school year 1979-80 to school year 1982-83, 22 courses were dropped and 43 courses were added at Chemawa, a net increase of 21 courses.

Enrollment

Between school years 1978-79 and 1982-83, Chemawa's enrollment increased from 229 to 429 students, or about 87 percent, as the following table shows. The enrollment increase since the 1980-81 school year was due to the increased dormitory space on the new Chemawa campus.

School year	Students
1978-79	229
1979-80	222
1980-81	333
1981-82	446
1982-83	429

Chemawa's student withdrawal rate for the 1981-82 school year was 37 percent. The withdrawal figures for 4 of the last 5 school years are shown below.

School year	Total student enrollment[a]	Year-end enrollment	Total withdrawals	Withdrawals as percent of total enrollment
1978-79	Information not available			
1979-80	412	217	195	47
1980-81	552	317	235	43
1981-82	721	454	267	37
1982-83[b]	559	274	285	51

[a]Total number of students registered at the school during all or part of the school year.

[b]As of April 20, 1983.

As of December 1982 Chemawa officials reported a waiting list of 61 applicants for enrollment.

Dormitory and classroom space criteria

The Chemawa facility manager and the acting chief of the BIA school facility staff in Albuquerque said that the new Chemawa school (completed in 1981) was designed and built in accordance with the BIA dormitory and classroom space guidelines. Also, Chemawa's December 1982 report stated that the BIA school facilities standards were used to establish the capacity of the dormitory and classroom areas.

The school's dormitory capacity is 400 students. This meets the BIA space guidelines for free space when the school assigns no more than two students to each room. However, in the fall of both 1981 and 1982, enrollment exceeded dormitory capacity, and according to the school principal, some of the dormitory rooms designed for two students temporarily housed three students.

Chemawa's December 1982 report to BIA headquarters stated that the school has an instructional capacity of 600 students based on 30 square feet of floor space per student on the average. According to the school principal, Chemawa's classrooms generally have a capacity of 25 to 28 students, which meets BIA's criterion.

APPENDIX I

CONCHO SCHOOL, OKLAHOMA

Concho School is an elementary school located in Concho, Oklahoma. Enrollment in January 1983 totaled 141 students.[1] The current school's facilities were built around 1967. The buildings used specifically for school operations were the school classroom building, two dormitories, a kitchen-dining facility, a music building, two air conditioning/heating buildings, and an older dormitory used by the education support services and counselors. Also, the U.S. Postal Service used part of another older dormitory, and the Indian Health Service maintained a clinic in a trailer next to this building. The school was scheduled to be closed in June 1983.

Concho's 1982-83 school year budget was $1,194,547.

Social and educational characteristics of the student body

Concho's summary of the student profiles showed that the 141 students represented 30 Indian tribes or combinations of tribes, but about half of the students were from the Kiowa and Cheyenne/Arapaho tribes. The students came from seven States but most, 119 of 141, or 84 percent, were from Oklahoma. The student body consisted of grades 1 through 8. Just over half of the 141 students had taken a 1982 standard achievement test. Performance for all students, except first grade students, averaged one grade below their present grade levels.

The enrollment reasons reported to BIA were predominantly social, mostly (1) family financial difficulties and (2) lack of adequate parental supervision. The predominant educational factor given for enrollment was that schools near the students' homes did not offer adequate provisions to meet academic deficiencies or linguistic/cultural differences.

Concho recorded 22 social and educational reasons for enrollment for the 14 students in our sample. Documents in the school's files supported 13 of the 22 reasons, or 59 percent. The files did not have documents supporting the other nine reasons, or 41 percent. School officials said that under the Education Amendments of 1978, Public Law 95-561, the parents are granted the right to make the final placement decision for their children. Concho officials added that the social and educational reasons for enrollment were not, therefore, always listed on the admission applications.

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[1]As shown on pages 3 and 14, the official student count for the 1982-83 school year was 137. The official student count for all 10 schools is the average number of students enrolled during 1 week in October and 1 week in November of the school year.

Proposed student placements

The proposed placement of the students, in the event Concho was closed, was made by the school staff and BIA area office based in most cases on parent or guardian responses. When a choice was not made, the school staff proposed assigning the student to either the public school closest to the student's home or another BIA school based on their knowledge of the student's needs.

Placement plans were completed on 103 students. Preference expressed by parents or legal guardians resulted in the proposed assignment of 78 students in public schools, 22 students in other dormitory-type schools, and 1 student in a tribal school. The files did not have information on the assignments for two students.

Time did not permit a verification of Concho's student placement plans.

Special programs

Concho's special programs and their funding levels were as follows.

Remedial learning

Title I of the Elementary and Secondary Education Act (now referred to as chapter 1 of subtitle D of title V of Public Law 97-35) provides special funds for mathematics, reading, and language arts training for students performing 2 or more years below normal grade level. Concho's program consisted of remedial courses in mathematics, English, spelling, and reading comprehension.

Concho's program had two teachers and three educational aides working with 70 students. Funding for school year 1982-83 was about $67,000.

Education of the handicapped

This program was funded by the Education for All Handicapped Children Act of 1975, Public Law 94-142. Basic subjects in the program are reading, English, and mathematics. Speech training is also offered if required for any student.

Concho's program had one teacher and one aide working with 18 students. Funding for school year 1982-83 was $16,668.

Social guidance

Concho's program served 99 students. Funding for school year 1982-83 was $98,115.

Other special programs for after class hours

Student activities after class hours were provided for Concho students on an informal basis with no special funding. Informal programs such as social and family matters and drug and alcohol abuse programs were offered for all students by the staff of the Indian Health Service clinic at the school. Also, a career education program was provided through materials and films at the school and by taking the students on field trips to familiarize them with career opportunities.

Physical condition of the school

A 1979 architectural/engineering facility survey indicated that the Concho educational and dormitory facilities were attractive and modern in design and equipment was in good condition. The report stated that the school did not have a preventive maintenance program and that developing one, including providing adequate maintenance personnel, should be a top priority to prevent major deterioration. The report also said that some older buildings should be demolished. The report made specific recommendations for upgrading all buildings and facilities to meet current code and handicap requirements and energy conservation criteria at a cost of about $2.03 million.

In December 1982 BIA Anadarko Area Office facility management officials estimated the repair and renovation costs to bring the Concho facilities up to the applicable health, safety, and handicapped standards at $1.46 million. This amount was arrived at by eliminating the 1979 study's costs associated with demolished buildings and buildings not used or needed by the school. These officials believed that these figures had not been updated or indexed for inflation.

The data Concho submitted in its operational plan on costs to bring the facilities up to the applicable health and safety standards was a copy of the summary sheet from the 1979 report with demolished buildings deleted but no adjustments to dollar amounts.

Staffing

Concho's staff decreased during the past 5 years from 84 to 66, or 21 percent, as the following table shows. The reductions had occurred in all but one staff category. For example, there were six fewer teachers, two fewer home living assistants, and two fewer food service workers. Also, two full-time driver positions were eliminated.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	25	27	25	15	14	- 44
Special education	5	5	5	4	4	- 20
Dormitory staff	21	20	17	16	19	- 10
Facility management	14	17	13	15	14	0
Other[a]	19	17	16	16	15	- 21
Total	84	86	76	66	66	- 21

[a]Includes administrative staff and transportation personnel.

The effect the staff reduction had on classroom courses over the 5 years included the following:

--The music program was eliminated, resulting in the loss of both band and vocal music programs.

--Male physical education was taught by the female physical education teacher.

--The industrial arts program was eliminated.

--One of the two language arts positions was cut, resulting in less time available to students needing individual help.

Also, the library was open to students only when a teacher brought her/his entire class there.

Enrollment

Between school years 1978-79 and 1982-83, student enrollment declined from 204 to 137, or about 33 percent, as shown below. The enrollment count was not verified because records were either not available or in poor condition due to an office fire.

School year	Students
1978-79	204
1979-80	181
1980-81	177
1981-82	167
1982-83	137

Concho's student withdrawal figures were not developed for the 1981-82 school year due to time and resource constraints. However, the withdrawal rate was estimated to be 30 percent by school officials.

Dormitory and classroom space criteria

Concho officials were unaware of BIA's March 1980 space guidelines and used a capacity criterion of four students per dormitory room, according to both Concho's principal and facility manager. The school's reported capacity based on the criterion of four students per dormitory room was 256 students.

The principal's opinion was that the capacity criterion of four students to a dormitory room was obsolete and that three students to a room would be more realistic. Under her criteria, the capacity would have been limited to 192 students. Nevertheless, the principal said that the existing criterion was no problem for the younger children but that for those children in sixth grade and above, it was too crowded to give them needed privacy.

The facility manager told us that each dormitory room had 198 square feet of floor space, and with two bunk beds in each room, there were 119 square feet of free space not occupied by beds, closets, or tables.

The principal told us that Concho had a classroom capacity of 236 students, but she did not know what criterion was used to determine that figure.

FLANDREAU INDIAN HIGH SCHOOL, SOUTH DAKOTA

Flandreau Indian School at Flandreau, South Dakota, began as a mission church school in 1871. In 1877 the Federal Government acquired the school. The school offers grades 9 through 12 and consists of 52 buildings and other facilities on 160 acres. Flandreau's dormitories, classrooms, auditorium, gymnasium, and dining hall were all built between 1963 and 1969. Other facilities include vocational shops, garages, living quarters, and trailer classrooms.

Flandreau's 1982-83 school year budget was $3,236,109.

Social and educational characteristics of the student body

Flandreau's December 1982 report to BIA headquarters showed that 311 of its 485 students[2] came from 21 States, mainly Wisconsin and South Dakota. They represented 36 tribes, predominantly Sioux and Chippewa.

Most (59 percent) of the enrollment reasons Flandreau reported to BIA were social reasons. The predominant one was behavioral problems too difficult for family or local resources to solve. Another 33 percent of the reasons were educational reasons, primarily that nearby schools did not offer adequate provisions to meet academic deficiencies or linguistic or cultural differences. The remaining 8 percent of the reasons were categorized as other, such as parental preference.

Our random sample of 15 students' files showed no admission reasons in 12 cases, or 80 percent. School officials' said that generally the enrollment reasons were not documented in a student's file because the eligibility criteria is documented at the agency level.

The standard achievement test administered in school year 1981-82 showed students in all grades to be performing below their grade levels. Grade 12 students were furthest behind at over 3 years.

Special programs

Flandreau's special programs and funding levels were as follows.

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[2]Enrolling agencies had provided information on only 311 of the school's 485 students enrolled for the 1982-83 school year.

Remedial learning

Flandreau's program provided reading, mathematics, and language arts to 269 students needing special assistance. The program had five teachers and five aides. Funding for the 1982-83 school year was $166,733.

Education of the handicapped

Four staff members provided special services to 17 handicapped students during the 1982-83 school year. Nine of these students received 15 or more hours a week of special services. Another six students received special services for 5 or more hours a week. Two students received speech therapy at least once a week. Funding for the 1982-83 school year was $67,242.

Exceptional child

This program's objective was to provide additional services to those students already in the exceptional child programs. Eight students in the handicapped program also received a minimum of 5 hours a week of special services under this program. These services included individual and group counseling plus recreational activities. One staff member was directly responsible for administering this program, but many school staff also participated. Funding was $8,920 for the 1982-83 school year.

Social guidance

During the 1982-83 school year, 200 of Flandreau's 485 students were in the IRG program. Four counselors and one tutor were funded under this program. In addition, 26 staff members, mostly teachers, were advisors for the students. These advisors volunteered for the program and received overtime pay. Generally, students who are enrolled in this program remain in it for the duration of their attendance at Flandreau. Funding for the 1982-83 school year was $195,239.

Alcohol and drug abuse education program

Flandreau disseminated information on drug and alcohol abuse through films, speakers, and small group discussions in the dormitories. Funding was provided from the regular educational program budget.

Vocational education

During the 1982-83 school year, 157 students received vocational training in building trades, automobile body repair and mechanics, welding, and drafting. Funding was provided from the regular educational program budget.

Solo-parent program

Flandreau initiated this program in January 1983. A vacant, 4-bedroom house on campus was renovated and furnished with beds and dressers from the dormitories. About $16,000 was budgeted for furniture and equipment.

Flandreau advertised for a guidance and counseling coordinator. The coordinator position will not be filled until the 1983-84 school year. Five home living assistants and a tutor were hired during the 1982-83 school year. Flandreau contacted the Indian Health Service clinic and requested a budget estimate from it for services to the mothers and babies in the program.

School personnel consulted with some of Intermountain's staff. Intermountain gave Flandreau technical assistance in opening its program by making budgetary suggestions and helping develop program guidelines. Intermountain forwarded six solo-parent applications to Flandreau. Five of the six applicants were enrolled in Flandreau's program at the time of our review. Flandreau's 1982-83 school year enrollment was six mothers and six babies. According to the superintendent, the maximum capacity in the house is eight mothers and eight babies. The program's proposed budget of $85,441 for fiscal year 1983 was not yet approved at the time of our review. Pending receipt of funds for the solo-parent program, the school was using funds from its home living department. School officials could not estimate when this budget would be approved.

Flandreau's superintendent said that expanding the solo-parent program would require building a new facility. He estimated potential enrollment could then be 14 to 16 mothers with the same number of babies.

Physical condition of the school

In 1979 an architectural and engineering firm surveyed the school and reported it to be in good condition but needing about $3 million to upgrade the buildings and the site. The firm's report stated that Flandreau's older buildings were structurally sound but in need of upgrading to meet current code requirements and correct wear and tear deficiencies. The campus was reported to be well maintained although the ground slope around most of the buildings needed to be corrected. At the time of the 1979 survey, Flandreau had not developed outdoor activity space. There was still no developed field for outdoor activities during the 1982-83 school year although the space was available.

Flandreau's March 1983 facility management report showed a need for about $4 million of improvements and repairs. According to Flandreau's December 1982 report to BIA headquarters, about $3 million of the improvements and repairs was needed to bring the facilities up to the applicable health and safety standards. No major repair or improvement program was in process or planned at Flandreau during the 1982-83 school year.

Staffing

Between school years 1978-79 and 1982-83, Flandreau reduced its staff from 140 to 134, or 4 percent, as the following table shows. The reductions of four in the facility management staff and seven in the academic staff were somewhat offset by an increase of eight in the home living (dormitory) staff.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	60	58	48	47	53	- 12
Student activities	10	10	6	6	9	- 10
Dormitory staff	34	39	31	35	42	+ 24
Facility management	20	17	17	16	16	- 20
Other[a]	16	16	16	16	14	- 20
Total	140	140	118	120	134	- 4

[a]Includes administrative and food services staff.

According to school officials, the staff reductions did not significantly affect the academic programs.

Enrollment

Between school years 1978-79 and 1982-83, Flandreau's student enrollment rose from 445 to 485, or about 9 percent, as shown below.

School year	Students
1978-79	445
1979-80	423
1980-81	487
1981-82	378
1982-83	485

Flandreau's student withdrawal rate for the 1981-82 school year was 40 percent. The withdrawal figures for the last 5 school years are shown in the following table.

School year	Total student enrollment	Year-end enrollment	Total withdrawals	Withdrawals as percent of total enrollment
1978-79	676	372	304	45
1979-80	653	330	323	49
1980-81	656	321	335	51
1981-82	605	361	244	40
1982-83[a]	625	379	246	39

[a]Figures as of Mar. 8, 1983.

Dormitory and classroom space criteria

The dormitory rooms at Flandreau were designed to house four students per room. Flandreau therefore reported a dormitory capacity of 592 students (148 rooms x 4 students) to BIA headquarters in December 1982. Flandreau's enrollment in March 1983 was 379. Under the proposed BIA criterion of 70 square feet of space per student per room (see p. 16), Flandreau's dormitory capacity would be 2 students per room, or a capacity of 296 students.

The classroom capacity of 923 students that Flandreau reported to BIA headquarters was in error. The total of 993 should have been reported, generally based on 25 students per classroom, according to the superintendent. However, school officials said that some of the classroom capacities reported to BIA were overstated. These included:

--Four home economics classrooms that showed 25 instead of 15 students per classroom.

--Five vocational classrooms that showed 20 instead of 12 students per classroom and another that showed 20 instead of 8 students per classroom.

--Four trailer classrooms that showed 25 instead of 15 students per classroom.

INTERMOUNTAIN HIGH SCHOOL, UTAH

Intermountain Inter-Tribal High School was constructed as a military hospital during the early 1940's. It is located in Brigham City, Utah, on about 266 acres. The facility includes 94 buildings, most of which are brick, but only 41 were used for school purposes at the time of our visit. In 1950 the facility was converted to a high school for the exclusive use of the Navajo Tribe. In 1974 the Navajo Tribe turned the school over to BIA because the Tribe's educational needs could then be met with on-reservation schools. Intermountain, which has been operated as a multitribal school since then, was scheduled to be closed in June 1984. Student enrollment as of January 1983 totaled 407. No freshman class was admitted for the 1982-83 school year.

Intermountain's school year 1982-83 budget was $3,745,450.

Social and educational characteristics of the student body

Intermountain's summary of student profiles showed that the 407 students represented over 84 tribes and 22 States (over half the students were from Arizona). Intermountain cited educational reasons as the enrollment reasons in 73 percent of the cases. The walking distance to school or bus was the most frequently cited educational reason. Social reasons were cited in 27 percent of the cases. The predominant social reason was behavioral problems too difficult for family or local resources to solve.

Our random selection of 45 student profiles showed that Intermountain recorded 95 social and educational reasons for student enrollments. The students' files contained documented support for 18, or 19 percent, of the 95 reasons.

A standard achievement test in 1982 showed that the students were performing below their grade levels for all grades at Intermountain. Grade 11 students were furthest behind at 3 years and 5 months.

Proposed student placements

Although Intermountain had gathered information on alternative school placements, BIA area office officials believe the parents have the right under the Education Amendments of 1978, Public Law 95-561, to make the final decision as to where their children will attend school. Therefore, the area office had not developed a student placement plan.

Intermountain reported to BIA the parents' preferences that were obtained through letters. The school's acting superintendent estimated that 50 percent of the parents responded to the letter. The students were also interviewed and filled out placement forms asking them to show their preferences.

Our review of the placement information reported by Intermountain and the BIA area office to BIA headquarters showed it was incomplete and contained minor inaccuracies.

Special programs

Intermountain's special programs and funding levels were as follows.

Remedial learning

Intermountain's program included 292 students and 13 staff members. Funding for school year 1982-83 was about $235,000.

Education of the handicapped

The school offered diagnostic and instructional services plus counseling for handicapped students. Special tutoring in regular classrooms was also available. Each student in the program had an individualized education plan that outlined the level of service the student needed. For the 1982-83 school year, Intermountain had 58 students served by five staff members. Funding for that year was about $159,000.

Social guidance

As of January 1982 Intermountain reported that 216 students, or about half the student body, were enrolled in the IRG program. Funding for school year 1982-83 was $190,080.

Alcohol and drug abuse education programs

Treatment of alcohol problems among Intermountain students was handled through various programs. The Care Center, staffed by 14 Intermountain and Indian Health Service personnel, was for students under the influence of intoxicants. The Care Center was serving 243 students in February 1983.

An alcohol treatment program was available for those students, referred by the Care Center counselors, with more serious drinking problems. A group of no more than eight students met twice weekly for a school year quarter.

An alcohol probation group was available for those students who had been placed on court probation for alcohol or drug abuse. The group met once weekly. Twenty-four students were served during the 1982-83 school year.

The sniffer program, jointly funded by Intermountain and the Indian Health Service, began in August 1980, due to the increasing number of students sniffing volatile inhalants (glue, gasoline, and spray paint). Reported incidents had steadily declined since the program started.

Vocational education

Intermountain offered vocational educational courses to juniors and seniors. In school year 1982-83 the course selections included auto mechanics, building construction, welding, cosmetology, and nursing.

Solo-parent program

The solo-parent family education program at Intermountain began in 1976 after 2 years of operating on a small, informal basis. The program offered pregnant high school girls and adolescent parents an alternative to dropping out of school. It addressed the young parents' needs in the areas of continued academic or vocational training, child care and parent education, home living instruction, and personal and child health care.

In school year 1981-82 the solo-parent program received a total of $200,000 ($93,000 from regular BIA funding and $107,000 from BIA's early childhood special funding).

Intermountain did not offer the solo-parent program for the 1982-83 school year because of budget reductions. Intermountain was sending its solo-parent applications to Sherman High School, located in Riverside, California, and Flandreau High School in Flandreau, South Dakota--two other off-reservation Indian boarding schools.

Physical condition of the school

The 1979 architect/engineer's facility review of Intermountain estimated that the cost to bring the total facility up to health and safety standards would be about $11.2 million. Responding to BIA's operational plan request, Intermountain reported in December 1982 that bringing the 41 buildings up to standards would cost about $4.5 million, including about $2.1 million to correct seismic deficiencies.

The Intermountain facility manager obtained the costs from the improvement and repair reports that were associated with safety standard deficiencies. The $4.5 million cost was understated by amounts related to site improvement costs (sewage, electrical power, and heating). Intermountain officials said that they believed the necessary repairs and improvements could be made for considerably less than $4.5 million, but they could not provide a firm estimate.

Staffing

During the past 3 school years, Intermountain had a reduction in staff from 346 to 166, or 52 percent, as the following table shows. Records were not available at the school to determine staffing levels for the 1978-79 and 1979-80 school years because the school had disposed of the records.

Staffing

Type	School years			Percent change: 1980-81 to 1982-83
	80-81	81-82	82-83[a]	
Academic	25	53.5	34	+ 36
Special education	20	22.5	21	- 5
Dormitory staff	124	92.5	59	- 52
Facility management	38	24.5	21	- 45
Other[b]	139	48	31	- 78
Total	346	241	166	- 52

[a]No freshman class admitted this year.

[b]Includes administrative staff and transportation personnel.

Intermountain's Director of Instruction said that reductions in teaching staff not only affected the numbers and types of course offerings but also the amount of individual attention that could be provided to the students, as well as the quality of the teaching.

School officials said that as a result of the staffing reductions, three education programs were eliminated and course offerings in four other programs were reduced from 37 to 23. Some of the effects were as follows:

--Fewer mathematics and language arts course offerings.

--A 67-percent reduction in science course offerings.

--Elimination of the Air Force junior ROTC program.

--Elimination of the drivers education program.

Enrollment

Between school years 1978-79 and 1982-83 Intermountain student enrollment declined from 898 to 390, or about 57

percent, as shown below. Intermountain did not admit a freshmen class during the 1982-83 school year.

School year	Students
1978-79	898
1979-80	753
1980-81	791
1981-82	779
1982-83	390

The student withdrawal figures were not developed for Intermountain due to time and resource constraints. However, school officials estimated Intermountain's student withdrawal rate for the 1981-82 school year to be 34 percent.

Dormitory and classroom space criteria

Intermountain officials and the area office education program administrator said that they had not used square footage guidelines to determine the student or dormitory capacities. The school's dormitory capacity was within the March 1980 BIA guidelines of 50 to 80 square feet of free space per pupil in each sleeping room. There were generally two students per room.

The BIA area office administrator said that enrollment capacities were based on a "judgment call." The administrator added that he considers humanitarian factors in determining the number of students per room.

MOUNT EDGECUMBE HIGH SCHOOL, ALASKA

During World War II, the Army and Navy constructed a temporary military base in Mount Edgecumbe, Alaska, for patrol and defense of the Alaskan coast. In 1946 the Department of Defense transferred the base to the Department of the Interior, which opened Mount Edgecumbe High School in early 1947. Today, 102 acres remain of the original 256-acre military base, with 94 of the surviving buildings still on the BIA facilities roster. Student enrollment in January 1983 totaled 224. The school was scheduled to be closed in June 1983. It did not admit a freshman class in school year 1982-83.

Mount Edgecumbe's school year 1982-83 budget was $5,769,627.

Social and educational characteristics of the student body

All of Mount Edgecumbe's students were from the State of Alaska. Seventy-five percent were Eskimos; the rest were from four other tribes. The school's profile summary reported that most (76 percent) of the 224 students had enrolled for educational reasons. The lack of special vocational and preparatory training opportunities near the student's home was the predominant educational reason. Social reasons were cited in 24 percent of the cases. Well-being of student imperiled by family behavioral problems was the predominant social reason.

Our random sample of 23 student profiles showed that Mount Edgecumbe reported a total of 32 social and educational reasons for enrollment. The files had supporting documentation for 19 of those reasons, or 59 percent. A standard achievement test in 1982 showed that the students were performing below their grade levels for all grades. Grade 11 students were furthest behind at 2 years and 6 months.

Proposed student placements

The student placements that Mount Edgecumbe and the BIA area office recommended were determined primarily by the parents or legal guardians who expressed school placement preferences. If the parent did not express a preference, the student's preference was requested. If neither parent nor child expressed a preference, the proposed school placement was the public school closest to the student's home.

Mount Edgecumbe had recommended placements for 148 students. Of these, 129 students were to be placed in public schools; 1 in a tribal school; 9 in BIA schools; 8 in private schools; and 1 in a correspondence school.

Our review of 17 student files showed that 16 students were recommended for placement in public schools and 1 in a private school. Under Mount Edgecumbe's placement plan, more than half

of the 17 sampled students would be attending nonaccredited high schools in Alaska in the 1983-84 school year. In addition, 6 of the 17 students enrolled in the remedial reading program may attend schools that do not offer remedial reading.

A survey had been sent to the superintendents and principals of the schools in the Mount Edgecumbe students' home communities (not necessarily the recommended placement schools) requesting information about the schools' curriculums. According to the Mount Edgecumbe teacher-in-charge, the school did not use the information obtained from the survey to determine whether the recommended placement schools could meet the students' special educational and social needs.

In an attempt to gather better data, a second, shorter questionnaire was sent to all the parents or legal guardians. Mount Edgecumbe received some of these responses after it had submitted the student placement plans to BIA.

Special programs

Mount Edgecumbe's special programs and funding levels were as follows.

Remedial reading

Mount Edgecumbe provided remedial reading to 118 students in grades 10, 11, and 12. The program had two full-time teachers and one part-time teacher. Funding for school year 1982-83 was $93,436.

Education of the handicapped

A speech impairment program provided therapy for students with speech problems. The common speech problems at Mount Edgecumbe were articulation and voice modification. Five students were enrolled in this program in January 1983. Funding for the 1982-83 school year was $2,973.

A specific learning disability program gave students remedial help in mathematics, English, and social studies. In January 1983 the program had 15 students enrolled. Funding for school year 1982-83 was $7,928.

Social guidance

Mount Edgecumbe did not have an IRG program but had received $8,920 from BIA for the 1982-83 school year for that purpose. A BIA official certified the enrollment of nine students in the IRG program during the fall 1982 enrollment count. However, as of January 1983 the program had not started because school officials had not found a social worker to operate the program. The school had received at least half the school year's funding for this special program that did not exist.

Alcohol and drug awareness education program

According to Mount Edgecumbe officials, the alcohol and drug awareness program required students found under the influence of alcohol or drugs to attend meetings sponsored by the Sitka Council on Alcoholism and Other Drugs. Mount Edgecumbe did not have a budget for the program because the City of Sitka, Alaska, and the Federal Government funded the meetings. In January 1983, 20 students were enrolled in this program.

Physical condition of the school

The 1979 architectural/engineering facility evaluation reported that the school had high maintenance costs caused by fuel prices, limited enrollment, and functional deficiencies, including buildings not designed for a school campus. It was estimated that repair and renovation costs to bring all facilities up to standards would be about $22 million.

In December 1982, while the backlog report still estimated costs totaling about $22 million, BIA's Juneau Area Office provided for the consultation plan a total cost estimate of $3.5 million for Mount Edgecumbe improvements and repairs.

According to BIA facilities management officials at Mount Edgecumbe and the Juneau Area Office, the $22 million estimate was considerably overstated. They said that the needed improvements and repairs could be made for $3.5 million, or about 16 percent of the $22 million backlog report estimate. This substantial cost reduction would be accomplished primarily by (1) eliminating 80 of the approximately 94 buildings on the BIA roster that were considered expendable by the local facilities managers and (2) reducing the cost estimates for repairs to most of the remaining buildings because the backlog report estimates were too high.

The reasons for the differences between the $22 million estimate in the backlog report and the $3.5 million estimate in the plan included the following:

--Some of the buildings included in the estimates were not in use or would have been closed if the school remained open.

--Some cost estimates were considerably higher than the actual cost of improving and repairing the buildings.

--In some cases the total costs included both estimates to repair and to replace the same buildings.

--The costs of improvements and repairs previously made to some buildings were not deducted from the estimates.

However, the school's $3.5 million estimate did not include estimates for energy efficiency improvements (storm windows and insulation) and utilities repairs, which were major items in the backlog report.

Staffing

Between school years 1978-79 and 1982-83, Mount Edgecumbe's staff level decreased from 148 to 109, or 26 percent, as the following table shows.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80[a]	80-81	81-82	82-83[b]	
Academic	46		38	35	28	- 39
Special education	5		7	6	5	0
Dormitory staff	27		37	34	25	- 7
Facility management	55		51	45	39	- 29
Other[c]	15		16	11	12	- 20
Total	148	([a])	149	131	109	- 26

[a]Records for this year were missing at the school.

[b]No freshman class admitted this year.

[c]Includes administrative staff and transportation personnel.

The school superintendent said that the staffing losses had a mixed effect on instructional operations and no effect on other operations. On the negative side, some teachers were teaching two or three subjects rather than one or two. However, teachers had smaller classes because the school's enrollment had declined. The school still provided, on a limited basis, some courses that were previously offered more frequently during the day. For example, the art classes were offered two periods each day instead of five times each day as in previous years.

Mount Edgecumbe had deleted and added several classes in the last 3 school years, as shown in the following table.

Courses Dropped from the Curriculum

Courses	School year dropped
Vocational English	1980-81
Native Literature	1980-81
Advanced Geography	1980-81
Basic Photography	1980-81
Advanced Drafting	1980-81
Yukip (Eskimo language)	1981-82

Courses Added to the Curriculum

Course	School year added
Physical Science	1980-81
Workstudy	1980-81
Library Science	1980-81
General Science (remedial)	1980-81
Pre-Algebra	1981-82
Office Procedures	1981-82
Personal Typing	1981-82
Aviation Education	1981-82

Enrollment

Between school years 1978-79 and 1982-83, Mount Edgecumbe's student enrollment declined from 437 to 238, about 46 percent, as seen in the table below. As noted earlier, the school did not admit a freshman class in school year 1982-83.

School year	Students
1978-79	437
1979-80	393
1980-81	391
1981-82	350
1982-83	238

Student withdrawal figures were not developed for Mount Edgecumbe due to time and resource constraints. However, school officials estimated Mount Edgecumbe's student withdrawal rate for the 1981-82 school year to be 34 percent.

Dormitory and classroom space criteria

According to Mount Edgecumbe's superintendent, the school's consultation plan contained incorrect data in that the three dormitories could actually accommodate only 349 students and not the 410 reported to BIA. The superintendent said that the

349-student capacity was based on visual observation of space availability. However, applying BIA's March 1980 informal guideline of 200 square feet per student, Mount Edgecumbe's dormitories would be limited to 342 students, as the following table shows.

Dormitory Capacity

Building number	Square feet	Application of BIA's 200 square feet per student guideline	Mount Edgecumbe's visual criterion
292	27,742	138	116
293	19,378	97	113
286	21,488	107	120
Total		342	349

BIA facilities management officials said that to support the 349-student capacity, they included recreational space in another building. However, BIA dormitory capacity guidelines provided no support for this interpretation.

Mount Edgecumbe's average class size of 13 students met the BIA classroom capacity criterion of not exceeding 30 students per class. The school reported classroom capacity of 410 students in its consultation plan.

PHOENIX INDIAN HIGH SCHOOL, ARIZONA

Phoenix Indian High School was established in 1891. The school is for students in grades 9 through 12 and consists of 29 buildings on 110 acres in Phoenix, Arizona. The dining hall, built in 1901, is the oldest building on campus. The seven dormitories were built between 1963 and 1969, and the academic and vocational classrooms were built in 1963 and 1964, respectively. The new gymnasium was built in 1975. In close proximity to the school are Phoenix Central High School and a parochial college preparatory high school.

Phoenix's 1982-83 school year budget was about $4 million.

Social and educational characteristics of the student body

Phoenix's December 1982 report to BIA headquarters showed that its 547 enrolled students represented 10 States (88 percent from Arizona) and 27 tribes (Papago ranked highest with 21 percent).

Educational reasons accounted for most (76 percent) of the enrollment reasons Phoenix reported in its December 1982 report. The predominant educational reason was that the nearest school or bus route was 1-1/2 miles or more away from a student's home. Social reasons, primarily family behavioral problems, accounted for the remaining 24 percent of the enrollment reasons. However, the students' files generally did not contain documents to support these enrollment reasons. School officials said that they believed it was only necessary to have a parent or guardian signature as enrollment documentation.

In our random sample of 15 students' files, we were unable to determine enrollment reasons for 9 students, or 60 percent. Of the remaining six students, five were enrolled for educational reasons and one for a social reason. Phoenix's report on these 15 students cited 37 enrollment reasons compared with the 6 reasons we found documented in the files.

A standard achievement test in school year 1981-82 showed students in all grades to be performing at least 2 years below their grade levels. Grade 12 students were furthest behind at 3 years 5 months.

Special programs

Phoenix's special programs and funding levels were as follows.

Remedial learning

Phoenix provided title I remedial reading and mathematics to 367 students. The students were served by 12 staff members,

including 3 teachers, 7 aides, an education specialist, and a secretary. Funding for the 1982-83 school year was $177,883.

Education of the handicapped

Phoenix had 38 students enrolled in the handicapped program in March 1983. These students received remedial learning in reading, English, and mathematics plus tutoring in the sciences. They were taught in smaller classes, had more individualized instruction, and were presented material at a slower pace than the title I students. Five staff, including two learning disability teachers, a speech pathologist, an education specialist, and a psychologist, administered the program. Funding for school year 1982-83 was $63,184.

Social guidance

The IRG program at Phoenix was an alternative residential placement program for the development of students with disciplinary problems. Students in this program were housed in a separate dormitory with stricter disciplinary rules than those applied to the rest of the student body. Eight staff members, including two home living counselors, worked with the 42 students in the program during the 1982-83 school year. The average stay in the program was a little over 1 month. The assistant principal for student services estimated that these students received about 30 hours a week of special services. However, he acknowledged that not all of those hours were documented. The hours of special services included individual and group counseling. Funding for the 1982-83 school year was $31,078.

Alcohol and drug abuse education program

Phoenix used various sources in the prevention and treatment of alcohol and drug problems among its student body. The health and physical education components of the academic department and the home living sessions of dormitory meetings were avenues for alcohol and drug education. Students with alcohol or drug problems were counseled by the school's psychologist or religion coordinator, school counselors, or the counselor from the Indian Health Advisory Board. Students voluntarily attended Alcoholics Anonymous meetings. When necessary, a student would be placed in a halfway house in the community for detoxification. This program did not receive separate funding, and the religion coordinator was paid solely out of church funds.

Phoenix planned to have two alcohol and drug prevention training sessions for its staff, one at the end of the 1982-83 school year and one at the beginning of the 1983-84 school year. Funds of $18,000 provided for this training are from title IV of the Elementary and Secondary Education Act. The Arizona Department of Health Services was to provide the trainers.

Vocational education

Phoenix's vocational education classes included wood and metal shop, automobile mechanics, mechanical drawing, nutrition, clothing, and typing. Seven staff members taught these courses. This program was funded under the school's regular education budget.

Physical condition of the school

The 1979 architectural and engineering survey at Phoenix cited about $1.3 million of necessary improvement and repair costs. The 1979 survey characterized the school as adequate, with necessary upgrade costs of about $1.1 million on the buildings and about $120,000 on the site. The survey recommended immediate replacement of the dining hall because it questioned whether the 78-year-old building could withstand earthquake-generated forces.

The school was in good condition during the 1982-83 school year, according to the Phoenix area supervisory engineer. The March 1983 Facility Management Backlog Report showed necessary improvement and repair costs of $3.7 million, not all of which were for health and safety work items. The report showed about $2.6 million as the cost of work items required or desired because of functional deficiencies. The other $1.1 million was for work items classified as safety or sanitary improvements or those required because of a violation of code, law, standard, order, or regulation.

The school had budgeted $1.6 million for the 1982-83 school year for improvements and repairs designed to provide handicapped accessibility and fire safety and for construction of both a new athletic fieldhouse and a replacement shop and warehouse.

Staffing

Between school years 1978-79 and 1982-83, Phoenix's staff decreased from 162 to 158, or 2 percent, as the following table shows.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	63	65	55	41	59	- 6
Student services[a]	67	71	63	62	65	- 3
Campus security	6	6	6	6	8	+ 33
Facility management	19	21	19	17	17	- 11
Other[b]	7	7	7	9	9	+ 29
Total	162	170	150	135	158	- 2

[a]Includes food services, home living, counseling, and student activities.

[b]Includes administrative and principal's office staff.

Phoenix officials said that one of the staff reduction's major effects in the instructional department was the inability to cover classes effectively when staff members needed to be on leave. This was also a major concern in one other department. A second effect was that Phoenix had a net reduction of 10 course offerings from school years 1978-79 to 1982-83. As a result of the staff reductions, course offerings in five programs were reduced.

Enrollment

Between school years 1978-79 and 1982-83, Phoenix's student enrollment decreased from 646 to 547, or 15 percent, as shown below.

School year	Students
1978-79	646
1979-80	516
1980-81	494
1981-82	484
1982-83	547

Phoenix's student withdrawal rate for the 1981-82 school year was 42 percent. The withdrawal figures for the last 5 school years are shown in the following table.

School year	Total student enrollment	Year-end enrollment	Total withdrawals	Withdrawals as percent of total enrollment
1978-79	783	384	399	51
1979-80	707	361	346	49
1980-81	665	528	137	21
1981-82	631	364	267	42
1982-83[a]	655	521	134	20

[a]Figures as of Mar. 2, 1983.

Dormitory and classroom space criteria

Phoenix reported a dormitory capacity of 888 students to BIA headquarters, based on three and four students per room depending on the room size and students' age. However, using recently proposed BIA regulations that call for 70 square feet of space per student per room would mean a dormitory capacity of 666.

Phoenix reported a classroom capacity of 1,073 students and an adjusted student capacity of 912, or 85 percent of capacity. The assistant principal said that the 912 figure was more practical because it is unlikely the school would operate at 100-percent capacity. The principal based the classroom capacity on professional judgment and criteria of the North Central Association of Colleges and Secondary Schools, which accredits the Phoenix Indian School. The school's 27 classrooms were rated at 25 students each; the 10 vocational shops at 14 students each; and the 9 laboratory classrooms at 16 students each. Other space includes a gymnasium, 50 students; 2 resource rooms, 8 students each; and 2 music areas, 24 students each. According to the proposed BIA regulations of 25 students per classroom and 70 square feet of dormitory space per student, the classroom capacity at Phoenix adequately matches the dormitory capacity.

RIVERSIDE INDIAN SCHOOL, OKLAHOMA

Riverside Indian School was established in 1871. It consists of grades 9 through 12 and is located at Anadarko, Oklahoma, on about 140 acres of land adjacent to the Bureau of Indian Affairs' Anadarko Area Office. The campus contains school buildings, a dining hall, dormitory buildings, support buildings, and staff housing. The two school buildings were built in 1932 and 1964. Cottage dormitories were added in 1939 and 1941. The administrative and support buildings were constructed in 1971, and the two large dormitories were constructed in 1978. A major renovation project involving the school administrative and dormitory buildings was nearing completion at the time of our review.

Riverside's school year 1982-83 budget was $1,951,921.

Social and educational characteristics of the student body

Riverside's December 1982 report to BIA headquarters showed that the 237 enrolled students represented 41 tribes (about half from the Cheyenne/Arapaho, Kiowa, Comanche, and Apache Tribes) and 16 States. Most students, 192 of 237, or 81 percent, were from four States, including over half, 136 of 237, or 57 percent, from Oklahoma.

According to Riverside's report, about 54 percent of the students were enrolled at Riverside for educational reasons, predominantly inadequate local school provisions to meet academic deficiencies or linguistic/cultural differences. The remaining 46 percent of students enrolled cited social reasons, predominantly lack of adequate parental supervision.

Our random sample of 15 student files showed that Riverside recorded five (38 percent) educational and eight (62 percent) social reasons for enrollment. School officials said that they used personal knowledge of the students, rather than the information in the student files, to determine the social and educational reasons for the students' enrollment. Also, they only listed one reason for enrollment for each student, even though many students may have had more than one reason for enrollment at the time of admission. For 11 students, a factor other than those listed by BIA as an enrollment reason (see pp. 6 and 7) were given by the Riverside Indian School.

A standard achievement test administered in April 1982 to 155 students at Riverside showed the grade equivalent for students generally to be more than one grade level below their current grades in school. The test covered the basic skills of reading, language arts, and mathematics.

Special programs

Riverside's special programs and funding levels were as follows.

Remedial learning

Riverside had one supervisory teacher and four educational aides in this program, which served 157 students. Funding for school year 1982-83 was $98,640.

Education of the handicapped

Riverside had assigned two teachers and one educational aide to the handicapped program, which served 24 students. A psychologist provided psychological and education testing, speech therapy, and therapeutic counseling services through a contract with the Anadarko Area Office. Program funding for the 1982-83 school year was $30,315.

Social guidance

Many of the school's staff members, including teachers and dormitory and recreation personnel, were involved in administering the IRG program. For the 1982-83 school year, the program had an enrollment of 116 students and a budget of $112,981.

Exceptional child residential program

The 12 students in this program in school year 1982-83 were counseled in responsibility, self-esteem, respect, attitude, cooperation, and career awareness by the dormitory staff after school hours. The program was funded under the school's regular curriculum funding.

Vocational education program

Vocational training was provided for 15 students during the 1982-83 school year at the Caddo Kiowa Vocational Technical School at Ft. Cobb, Oklahoma, at a total cost of $5,500. Courses available included auto mechanics, refrigeration, food services, printing, data processing, masonry, clerical skills, and welding.

Physical condition of the school

The 1979 architect/engineer's facility review of Riverside estimated that it would cost $6,217,710 to bring the total facility up to applicable health and safety standards.

Renovation work was being done in early 1983 on 22 campus buildings, including 6 employees' quarters, for about $1,160,000. Most of the work was on the two main educational buildings. Many classes and the school administration were in temporary quarters.

The 11 dormitories on campus were all in excellent condition. The two large dormitories (lodges), housing 64 students each, were built in 1978 for about $2,100,000. A renovation project involving the nine cottage dormitories (seven buildings) had just been completed at a cost of about $1,218,000. As of November 1982, students were residing in six of the dormitory buildings (the two lodges and four of the cottage dormitories). Five of the cottage dormitories were not being used because, according to the superintendent, not enough staff were available for supervisory purposes. However, he said that these dormitories were not needed to handle the 1982-83 school year enrollment and that the dormitories were not overcrowded. The director of pupil personnel services said that 15 to 20 additional staff would be needed to operate the five cottage dormitories.

The facility manager estimated that $960,300 in new construction and $326,700 in repair and renovation costs, a total of $1,287,000, would be needed in addition to the 1982-83 school year projects to bring the school facilities up to applicable health and safety standards.

Staffing

Between school years 1978-79 and 1982-83, Riverside's staff decreased from 144 to 89, or 38 percent, as the following table shows. Most of this reduction was absorbed by the pupil personnel services department, which included dormitory staff, counselors, and recreation personnel.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	26	23	17	15	17	- 35
Special education	13	10	9	9	10	- 23
Dormitory staff[a]	64	59	34	36	32	- 50
Facility management[b]	21	20	19	16	15	- 29
Other[c]	20	15	12	13	15	- 25
Total	144	127	91	89	89	- 38

[a]Includes dormitory staff, counselors, and recreation personnel.

[b]Includes security personnel.

[c]Includes administrative staff and food services personnel.

Enrollment

Between school years 1978-79 and 1982-83, Riverside's student enrollment decreased from 242 to 237 students, or about 2 percent, as the following table shows.

School year	Students
1978-79	242
1979-80	243
1980-81	278
1981-82	259
1982-83	237

Riverside's student withdrawal rate for the 1981-82 school year was 47 percent. The withdrawal figures for 4 of the last 5 school years are shown below.

School year	Total student enrollment	Year-end enrollment	Total withdrawals	Withdrawals as percent of total enrollment
1978-79	336	191	145	43
1979-80	333	200	133	40
1980-81	345	186	159	46
1981-82	338	178	160	47
1982-83	Information not available			

Dormitory and classroom space criteria

Riverside officials reported to BIA headquarters in December 1982 that their dormitory capacity was 370 students and their classroom capacity was 454 students.

The dormitory capacity was based on assigning two students to a room, as shown below:

Dormitory capacity of 2 students per room:	
167 rooms in 11 dormitories	334
18 large rooms in 9 dormitories	36
Total	370

The classroom capacity and teacher-to-student ratio were based on North Central Association of Colleges and Secondary Schools' accreditation criteria.

SEQUOYAH HIGH SCHOOL, OKLAHOMA

Sequoyah High School, located in Tahlequah, Oklahoma, encompasses 644 acres, including 165 acres for the school campus, housing area, and golf course and 479 acres for a farm that was being leased.

The buildings in use included the main administration and classroom building, gymnasium, vocational shop building, and two dormitories constructed in 1966. An athletic building, constructed in 1976 and later converted into a kitchen and dining room facility, was destroyed by fire in early 1982. An existing dormitory building was completely renovated with work completed in August 1982. However, the building was not being used due to a lack of dormitory staff. Enrollment in January 1983 totaled 192 students in grades 9 through 12. Sequoyah was scheduled to be closed in June 1984.

Sequoyah's school year 1982-83 budget was $1,598,310.

Social and educational characteristics of the student body

Sequoyah's profile summary showed that the 192 students represented 24 tribes (predominantly Cherokee and Creek) and 13 States (mainly Oklahoma, with 156 students).

Of the reasons given for enrollment at Sequoyah, 54 percent were social reasons and 46 percent were educational reasons. The predominant social reason was lack of adequate parental supervision. The main educational reason was that public/Federal day schools near students' homes did not offer adequate provisions to meet academic deficiencies or linguistic/cultural differences.

Our review of 22 randomly selected student files showed a total of 65 social and educational reasons for enrollment. Supporting documentation was available for 9 of the 65 reasons, or about 14 percent. Documentation was incomplete for the remaining 56 reasons.

A standard achievement test in 1982 showed that the students were performing one grade below their grade levels for all grades at Sequoyah.

Proposed student placements

Sequoyah's recommended student placements were based on parent and/or student preferences, if made. If neither parent nor student had a preference, the school staff and BIA area office proposed assignment to either the public school closest to the student's home or another BIA school, whichever provided the curriculum/programs most like those of Sequoyah.

The parents or legal guardians of Sequoyah's 151 students in grades 9 through 11 were contacted, and 50 expressed the

following school placement preferences: 18 students to a public school; 3 to a vocational school; 2 to some other type of school; and 27 did not have a preference. Most of the 151 proposed placements were determined by school staff.

Time constraints did not permit a verification of Sequoyah's student placement plans.

Special programs

Sequoyah's special programs and funding levels were as follows.

Remedial learning

Sequoyah's program had one teacher and one educational aide working with about 100 students. Funding for the 1982-83 school year was $88,600.

Education of the handicapped

Sequoyah's program had one educational aide working with 18 students. Funding for the 1982-83 school year was $37,718.

Social guidance

Sequoyah's IRG program served 118 students for the 1982-83 school year and funding was $89,903.

Vocational training

Vocational training for 20 students was provided under contract during the 1982-83 school year at a cost of $9,545. Courses were available in health occupations, clerical skills, welding, auto mechanics, masonry, carpentry, heating/air conditioning and refrigeration, and diesel mechanics.

Instructional materials and school library resources program

Sequoyah's program operated satellite libraries in the two dormitories.

Drug abuse counseling and training program

This program was initiated under a 13-week (September-December 1982), $15,000 contract that provided staff training during the first half of the semester and then both staff training and student counseling during the second half of the semester. Counseling by school staff was available to students who needed it.

Other student programs for afterschool hours

A program of home living guidance was provided for about 200 students by 16 assistants, 1 aide, 1 dormitory manager, and 1 recreation specialist. Two of the assistants worked on an intermittent basis and were subject to call on a 24-hour basis. The dormitory program had contingency funds for students needing clothing and supplies such as sheets, towels, and toilet articles.

A recreation program provided an equal opportunity for every student at Sequoyah to participate in some type of recreational activity regardless of individual physical limitations, interests, or ability.

Physical condition of the school

The 1979 architectural/engineering facility evaluation reported that Sequoyah was a very suitable school installation that met all functional requirements and, as a general rule, it was in good condition. The report further stated that the general condition of the property and normal maintenance were excellent, and that the campus was suitable for its intended purpose. A few items required additional maintenance to bring the campus up to standards.

The report recommended that all facilities be upgraded to meet current code and handicap requirements and that a preventive maintenance program be implemented. All of the sites and facilities revealed a program of inadequate preventive maintenance. The report stated that many work items would not be necessary if normal preventive maintenance procedures were established to correct situations before major problems developed. The 1979 review estimated repair and renovation costs of $2.84 million to bring the school up to code standards.

In December 1982 BIA headquarters was told that repair and renovation costs of $1.26 million would be required to bring the facilities then in use up to applicable health, safety, and handicap standards. This estimate was based on revised cost estimates of work recommended by the facilities survey and evaluation review team and additional repair and renovation work to be done that was identified since the 1979 survey.

A 1982 health and safety inspection of the campus buildings by an Indian Health Service representative indicated that all buildings then being used were in good condition from a health and safety standpoint, although the boys' dormitory needed some repair work due to vandalism.

Staffing

During the last 5 school years, staff at Sequoyah was reduced from 95 to 67, or 29 percent, as the following table shows. Most of this reduction was absorbed in nonteaching positions such as home living assistants, guidance counselors, and administration.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	24	21	21	16	18	- 25
Special education	9	9	11	8	3	- 67
Dormitory staff	27	28	20	17	18	- 33
Facility management	16	16	17	16	13	- 19
Other[a]	19	17	16	16	15	- 21
Total	95	91	85	73	67	- 29

[a]Includes administrative staff and transportation personnel.

The staff reduction's effects on classroom courses included the following:

--Two basic reading courses were combined into one language arts course.

--The girls' and boys' physical education classes were both taught by the boys' physical education teacher.

--The vocational agriculture course was dropped.

--Art was discontinued.

--Speech and drama courses were eliminated.

--Some classes were larger but within limits for State accreditation.

Also, the library was only open half days under the supervision of an English teacher.

Enrollment

Between school years 1978-79 and 1982-83, Sequoyah's student enrollment declined from 234 to 179, about 24 percent, as the following table shows.

School year	Students
1978-79	234
1979-80	222
1980-81	218
1981-82	181
1982-83	179

Student withdrawal figures were not developed for Sequoyah due to time and resource constraints. However, school officials estimated Sequoyah's student withdrawal rate for the 1981-82 school year to be 30 percent.

Dormitory and classroom space criteria

Sequoyah officials, who were unaware of the BIA 1980 space guidelines, used a capacity criterion of 4 students to a dormitory room when they reported a dormitory capacity of 288 students in the consultation plan. The dormitory rooms in the two buildings in use had 221 square feet each. School officials considered the four students per room criterion to be a theoretical maximum and said that a two students per room criterion would be ideal.

A third dormitory building had been renovated recently and was ready for occupancy. School officials did not include this building in arriving at the dormitory capacity figures because they did not plan to use this building until dormitory staff could be provided. This dormitory had a capacity of 78 students, based on 2 to 4 students per room.

Sequoyah reported in its consultation plan that its maximum classroom capacity was 527 students in 20 classrooms with a maximum of 30 students per room.

SHERMAN INDIAN HIGH SCHOOL, CALIFORNIA

Sherman Indian High School, which BIA established in 1892, provides education to students in grades 9 through 12. The Sherman campus encompasses over 83 acres in Riverside, California.

In 1967 eight of the school buildings were condemned for failure to meet California's earthquake standards. Some of the newer school buildings, including eight dormitories, the cafeteria, and the school shops, were not affected. In 1970 BIA demolished the condemned buildings and developed plans for a new school complex. The new complex was built in three phases between 1973 and 1979. Sherman now comprises 37 buildings, including 8 dormitories and 2 buildings containing student apartments.

Sherman's 1982-83 school year budget was about $5,432,000.

Social and educational characteristics of the student body

Sherman's 1982 Off-Reservation Boarding School Report showed that the 741 enrolled students represented 42 tribes (predominantly Papago and Gila River Pima). Most students were from Arizona, although students came from 13 other States.

Of the reasons given for enrolling at Sherman, 64 percent were educational reasons and 36 percent were social reasons. The predominant educational reason was that the walking distance from home to the school or bus exceeded 1-1/2 miles. The main social reason was that the student did not receive adequate parental supervision.

Our random sample of 15 student files showed that 12 students enrolled for 12 (63 percent) educational and 7 (37 percent) social reasons. Two files did not show any reason for enrollment, and one file indicated only that the student preferred to attend Sherman.

A standard achievement test in 1982 showed that Sherman students performed below their grade levels for all four grades. Grade 11 students were the furthest behind in mathematics at 9 years. Students in grades 11 and 12 were 2 years and 1 month behind in language arts.

Special programs

Sherman's special programs and funding levels were as follows.

Remedial learning

According to the special education specialist, Sherman taught remedial reading, mathematics, or language arts to 359

students in school year 1982-83. The program had six full-time teachers and four education technicians. Funding for the 1982-83 school year was about $244,000.

Education of the handicapped

According to the special education specialist, the specific learning disability program provided students with tutorial service, career development, and academic instruction in reading, language arts, and mathematics. Two full-time teachers provided services to 24 students. The program budget was about $33,000 in school year 1982-83.

Social guidance programs

According to the pupil personnel services director, Sherman offered students IRG and youth diversion team programs for social guidance. As of March 1983 the IRG program had one counselor to provide services to 48 students. The 1982-83 school year program budget was about $76,000.

The program, funded by Riverside County, provided counseling services and required students to make restitution for their offenses by doing campus work, writing essays, or other tasks. Students avoided court cases for minor offenses by participating in this program. Riverside County personnel administered this program, in which 30 students were participating as of March 1983.

Mental health program

According to Sherman's mental health consultant, the mental health program provided direct clinical services, consultation, liaison, and educational training services to students. The consultant said that the program was providing services to 42 students as of March 1983 and was funded by the Indian Health Service.

Alcohol and drug abuse education program

This program provided counseling services and lectures for drug and alcohol abusers. Riverside County funded the program and provided staff to serve about 100 Sherman students.

Vocational education

Sherman students participated in career awareness programs and an on-the-job training program. During the 1982-83 school year, between 60 and 80 students attended career awareness programs and 20 students participated in the job training program. Some of the topics this program covered were forestry, nursing, auto mechanics, computers, banking, and child care operations. The vocational program provided funds for the career awareness

programs, but Sherman officials could not provide a specific amount. Riverside County schools funded the on-the-job training program.

Solo-parent program

Sherman's solo-parent program started in February 1983. The program offered single-parent students the opportunity to build better child-parent bonds while continuing their education. Students attend classes during the day while the children attend nursery school. After school the students assume full responsibility for their children.

In March 1983 six Sherman students, including one male student, and their children were participating in the program. The estimated program budget was $40,000. School officials said that Sherman had not planned any new facilities because the solo parents were housed in existing school apartments. Each apartment could accommodate one or two parents and their children. An official said that Sherman could accommodate a total of 13 parents plus their children in these apartments and a maximum of 29 parents and children if all available apartment space was used. A school official said that Sherman had hired five staff members to operate this program.

A Sherman official said that one student, who had completed an application, was on the solo-parent program waiting list. Sherman also had 15 inquiries from current students and several inquiries from other BIA area offices.

Physical condition of the school

The buildings and grounds on the Sherman campus were generally in good to excellent condition. The housekeeping was good, and a preventive maintenance program had been in effect for several years.

The school's kitchen and dining facility was completed in 1962. The eight student dormitories were built in 1964 and 1965, while the administrative, classroom, and athletic and recreational areas were built between 1973 and 1978.

A 1979 architectural/engineering facility survey made recommendations to correct deficiencies found in each facility. These repairs were completed at a cost of $805,000, according to the Sherman facility manager. Sherman's backlog maintenance report, updated annually, showed that in school year 1982-83 improvements and repairs estimated at $1.6 million were scheduled for completion.

APPENDIX I

Staffing

Sherman's staff increased from 144 to 181, or 27 percent, between school years 1978-79 and 1982-83, as the following table shows.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	28	27	33	34	38	+ 36
Student services	1	1	2	5	8	+ 700
Dormitory staff	(a)	(a)	(a)	36	50	+ 28
Facility management	(a)	(a)	19	19	20	+ 5
Other	(a)	(a)	(a)	49	65	+ 33
Total	144	144	148	143	181	+ 27

[a]Sherman did not retain specific staffing information for these years.

Over the 5 school years, Sherman had added or deleted many vocational and fine arts classes, including metal shop, general shop, needlecraft, arts and crafts, drama, and several music classes. It restructured the mathematics department to better suit student needs; for example, algebra I and II and geometry were offered as separate classes during specific periods of the day. Previously, one mathematics class might encompass two or three skill levels, depending on the students' skills and special needs.

Enrollment

Between school years 1978-79 and 1982-83, Sherman's enrollment increased from 689 to 741 students, or about 7 percent, as the following table shows.

School year	Students
1978-79	689
1979-80	585
1980-81	695
1981-82	687
1982-83	741

In February 1983 Sherman had 31 applicants on its enrollment waiting list.

Sherman's student withdrawal rate for the 1981-82 school year was 33 percent. The withdrawal figures for the last 5 years are shown below.

School year	Total student enrollment	Year-end enrollment	Total withdrawals	Withdrawals as percent of total enrollment
1978-79	689	489	200 (est.)	29
1979-80	595	420	225 (est.)	29
1980-81	734	509	225 (est.)	31
1981-82	784	522	262	33
1982-83[a]	841	581	260	31

[a]As of Apr. 19, 1983.

Dormitory and classroom space criteria

Sherman officials were unaware of the March 1980 BIA space guidelines; instead, they used capacity criteria of three students per dormitory room and two students per apartment sleeping room. Based on these criteria, the school's capacity was 988 students. Even though Sherman officials were unaware of the space guidelines, they had been in compliance with the BIA space criterion as they housed no more than three students in each dormitory room.

The facility manager said that Sherman's instructional facilities were built to accommodate about 1,000 students. He did not know what classroom space criteria BIA used to determine this capacity. The vice principal said that the average classroom capacity was 24 students.

WAHPETON SCHOOL, NORTH DAKOTA

Wahpeton Indian Boarding School, established in 1908, provided elementary school instruction in grades 3 through 8 in school year 1982-83. In the 1983-84 school year, it is scheduled to offer grades 4 through 8. The school is located on 52 acres in Wahpeton, North Dakota. The facility consists of 27 buildings, including 3 dormitory buildings and 1 building with 14 classrooms. Enrollment in December 1982 totaled 282 students.[3]

Wahpeton's 1982-83 school year budget was $2,032,578.

Social and educational characteristics of the student body

Wahpeton's summary of the student profiles showed that the 282 students represented 37 tribes (predominantly Chippewa) and 10 States (mainly North Dakota, Minnesota, and Montana). According to the summary, about 52 percent of the students enrolled at Wahpeton for social reasons, predominantly lack of adequate parental supervision. The remaining 48 percent cited educational reasons, predominantly that the parents or students were dissatisfied with the local school.

Our random sample of 31 student profiles showed that Wahpeton recorded 36 social and educational reasons for enrollment. Documents in the files and interviews with school officials supported 13 of those reasons, or 36 percent. Of the remaining 23 reasons, 19 were not completely documented. School officials said that under the Education Amendments of 1978, Public Law 95-561, the parents are granted the right to make the final placement decision for their children. Wahpeton officials added that the social and educational reasons for enrollment were therefore not always obtained on the admission applications.

Proposed student placements

The BIA Aberdeen Area Office, at Wahpeton's request, developed the placement plans for Wahpeton's students. The criteria used for proposing placement, in order of application, were (1) parents' stated preference, (2) students' stated preference for sixth and seventh grade students, and (3) the public school nearest the student's home. Individual students' needs were not considered in assessing placement options.

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[3]As shown on pages 3 and 14, the official student count for the 1982-83 school year was 306. The official student count is the average number of students enrolled during 1 week in October and 1 week in November of the school year.

The proposed placements covered 205 students in the seventh grade and below. Of the 205 students, 141 were to attend public school; 13, private schools; 15, tribal schools; and 36, another BIA school.

Of the 31 students in our review sample, 22 were in the seventh grade and below. Parental responses had been received for 16 of these 22 students. Two indicated a preference to remain at Wahpeton, nine to attend public schools, and five to attend BIA day schools. The area office recommended the preferred placement for all except the two students whose parents preferred Wahpeton. For these two students and for the six students for whom no parental responses were received, the area office recommended placement at the public school nearest each student's home.

Special programs

Wahpeton's special programs and funding levels were as follows.

Remedial learning

Wahpeton had five teachers (three full-time) and five teacher aides (three full-time) working with 186 students. Funding for school year 1982-83 was $98,776.

Education of the handicapped

Wahpeton had two certified learning disability teachers--a speech teacher and a diagnostician--and two teacher aides serving 50 students. Funding for school year 1982-83 was $87,528.

Social guidance

Although Wahpeton had no formal IRG program, the services of such a program were provided to the students, according to the school's superintendent.

Physical condition of the school

The 1979 facility evaluation report said that the Wahpeton facilities' overall condition was good and estimated that repair and renovation costs of $1.65 million would be required to bring the facilities up to standards. In response to BIA's October 27, 1982, consultation plan, the facility management foreman at Wahpeton, with the concurrence of the facility manager at the Aberdeen Area Office, reduced estimated improvement and repair costs from $1,386,892 to $327,000. According to Wahpeton's facility management foreman, "common sense" was the criterion he and the area facility manager used to delete the unnecessary costs. The foreman said that he and the area facility manager had agreed on what items from the 1979 report should be deleted.

He added, however, that other items in the report should have been deleted but were overlooked because the facility manager and he did not discuss every building and every item during the time they spent evaluating the report.

Examples of additional work the foreman believed was unnecessary to meet applicable health and safety standards were as follows:

--Test, and if necessary replace, fire hoses; estimated cost $1,142. This item was deleted on many buildings because the fire hoses, having not been used in 10 years, were in good condition.

--Install 15 pressure balance valves; estimated cost $2,473. The foreman said that pressure valves were not needed because each heating zone had its own circulating pump.

The foreman also provided examples, two of which are shown below, of many items that he considered had overstated costs in the 1979 report, based on his experience after having repaired the items or his awareness of what the repair costs should be.

--Install double glazed units at window openings; estimated cost $11,154. The foreman provided a local contractor's estimate to complete the job for $1,810.

--Construct concrete wall-tuck point and repair cracks on existing foundation and backfill on two employee houses at an estimated cost of $10,752 and $13,768. According to Wahpeton's foreman, these items were completed in summer 1981 at a total cost of about $5,000.

Staffing

During the past 5 years, Wahpeton's staff was reduced from 100 to 91, or 9 percent, as the following table shows. The major staff reduction occurred between school years 1980-81 and 1981-82.

Staffing

Type	School years					Percent change: 1978-79 to 1982-83
	78-79	79-80	80-81	81-82	82-83	
Academic	21	21	22	19	19	- 10
Special education	31	32	30	28	32	+ 3
Dormitory staff	15	14	13	9	8	- 47
Facility management	13	18	16	18	18	+ 38
Other[a]	20	17	16	15	14	- 30
Total	100	102	97	89	91	- 9

[a]Includes administrative staff and transportation personnel.

Wahpeton officials had mixed views on the effect of staffing pattern changes on the school's operations. The superintendent explained that the reduction between 1980-81 and 1981-82 was due to a hiring freeze at that time. He said that the freeze did not significantly affect the school, although five and a half academic positions were frozen and enrollment was reduced. Two of these positions were teachers and the rest were aides or similar positions. The principal, however, said that the staffing change had affected Wahpeton's academic area, because the school was unable to fill an eighth grade teaching position and the librarian position.

Enrollment

Between school years 1978-79 and 1982-83, Wahpeton's student enrollment increased from 299 to 306, or 2 percent, as the following table shows.

School year	Students
1978-79	299
1979-80	294
1980-81	295
1981-82	262
1982-83	306

Student withdrawal figures for Wahpeton were not developed due to time and resource constraints. However, school officials estimated Wahpeton's student withdrawal rate for the 1981-82 school year to be 28 percent.

Dormitory and classroom space criteria

In the consultation plan, Wahpeton reported a dormitory capacity of 396, based on a criterion of four students per room, and a classroom capacity of 350 students, based on 14 classrooms and a criterion of 25 students per classroom. According to Wahpeton's superintendent, these criteria were established by his predecessor, and he was unaware of BIA's March 1980 space guidelines.

The school had two sizes of dormitory rooms: 204 square feet and 220 square feet. Free space per room, exclusive of furniture, was about 33 square feet for each occupant.

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